

State: Pennsylvania **Filing Company:** Continental General Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 4LTCI RATE INCREASE FILING 2020/

Filing at a Glance

Company: Continental General Insurance Company
Product Name: Long Term Care
State: Pennsylvania
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.001 Qualified
Filing Type: Rate - Other (Not M.U. or G.I. Product)
Date Submitted: 07/08/2020
SERFF Tr Num: GLTC-132449586
SERFF Status: Assigned
State Tr Num: GLTC-132449586
State Status: Received Review in Progress
Co Tr Num: 4LTCI RATE INCREASE FILING 2020

Implementation: On Approval
Date Requested:
Author(s): Beth Lovaas, Cameron Zima, Huyen Pham, Elizabeth Burchfield, Noah Simonson, Melissa Sample, Elizabeth O'Brien, Sean Zhou, Madison Nahrup
Reviewer(s): Jim Lavery (primary)
Disposition Date:
Disposition Status:
Implementation Date:

State Filing Description:
Proposed 15% increase on 364 PA policyholders of Great American Life LTC form 4LTCIP0001.

State: Pennsylvania
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 4LTCI RATE INCREASE FILING 2020/
Filing Company: Continental General Insurance Company

General Information

Project Name: 4LTCI RATE INCREASE FILING 2020

Project Number:

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact: 15%

Deemer Date:

Submitted By: Huyen Pham

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments: Texas is the state of domicile

Market Type: Individual

Individual Market Type:

Filing Status Changed: 07/10/2020

State Status Changed: 07/10/2020

Created By: Huyen Pham

Corresponding Filing Tracking Number:

State TOI: LTC03I Individual Long Term Care

Filing Description:

Dear Sir or Madam:

Enclosed for your review, please find copies of an Actuarial Memorandum and rate sheets in support of the current proposed increases on the above-referenced Long-Term Care Insurance products.

The base rate increase applies to the base policy and all applicable benefit riders for which a premium is paid. The rate increase will be effective on the first premium due date subsequent to state insurance department approval and in accordance with state policyholder notification requirements, with the additional condition that no policyholder will receive a rate increase sooner than one year after receiving a prior rate increase, if applicable.

This filing applies to inforce policies issued in this state. The above referenced policy forms are Individual Long-Term Care insurance products, which are no longer being sold.

Enclosed are any necessary certifications, transmittals, and/or filing fees as may be required by your state. I hope that with this information your approval of this filing will be forthcoming. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

Elizabeth A. O'Brien, FSA, MAAA
Associate Actuary
Continental General Insurance Company

Company and Contact

Filing Contact Information

Madison Nahrup, Manager of Pricing
11001 Lakeline Blvd. Suite 120
Austin, TX 78720

Madison.Nahrup@continental-ins.com
512-969-2837 [Phone]

SERFF Tracking #: GLTC-132449586

State Tracking #: GLTC-132449586

Company Tracking #: 4LTCI RATE INCREASE FILING
2020

State: Pennsylvania

Filing Company: Continental General Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Long Term Care

Project Name/Number: 4LTCI RATE INCREASE FILING 2020/

Filing Company Information

Continental General Insurance
Company
11001 Lakeline Blvd
Suite 120
Austin, TX 78717
(866) 830-0607 ext. [Phone]

CoCode: 71404
Group Code: 84
Group Name:
FEIN Number: 47-0463747

State of Domicile: Texas
Company Type: Life & Health
State ID Number:

Filing Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? Yes
Fee Explanation: Texas is the state of domicile. Texas filing fee is \$100.
Per Company: Yes

Company	Amount	Date Processed	Transaction #
Continental General Insurance Company	\$100.00	07/08/2020	180529876

State:	Pennsylvania	Filing Company:	Continental General Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	4LTCI RATE INCREASE FILING 2020/		

Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	20.000%
Effective Date of Last Rate Revision:	09/03/2019
Filing Method of Last Filing:	SERFF
SERFF Tracking Number of Last Filing:	GLTC-131962412

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental General Insurance Company	15.000%	15.000%	\$178,106	364	\$1,187,374	15.000%	15.000%

State:	Pennsylvania	Filing Company:	Continental General Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	4LTCI RATE INCREASE FILING 2020/		

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		PA - Rate Sheets - 4LTCI	4LTCIP0001	Revised	Previous State Filing Number: GLTC-131962412 Percent Rate Change Request: 15	PA - Rate Sheets - 4LTCI.pdf,

Current Rates

Continental General Insurance Company Policy Form: 4LTCIP0001 (PA)

Base Rates per \$10 of Daily Benefit Benefit Periods*

	365 Days	730 Days	1095 Days	1460 Days	1825 Days	2190 Days	Unlimited
Nursing Home	57.07	76.11	92.78	105.12	119.59	139.82	179.23
Assisted Living Facility	19.02	25.38	30.92	35.03	39.86	46.60	59.74
Home Health Care	7.77	10.35	12.62	14.31	16.28	19.02	24.38

* Benefit Periods between years are interpolated between full year benefit periods

Example: Rate for a 1,000 day BP would be calculated as follows:

$$730 \text{ day rate} \times (1095 - 1000) / (1095 - 730) + 1095 \text{ day rate} \times (1000 - 730) / (1095 - 730)$$

$$76.11 \times (95 / 365) + 92.78 \times (270 / 365) = 88.44$$

Unlimited is assumed to be 3650 days for purposes of interpolating.

Elimination Period Factors

Benefit	Elimination Period										
	0 Day	20 Day	30 Day	50 Day	60 Day	90 Day	100 Day	120 Day	150 Day	180 Day	365 Day
NH and ALF	1.43	1.33	1.28	1.20	1.17	1.02	1.00	0.97	0.92	0.87	0.82
HHC	2.50	2.20	1.93	1.50	1.35	1.05	1.00	0.88	0.75	0.55	0.50

Proposed Rates

Continental General Insurance Company Policy Form: 4LTCIP0001 (PA)

Base Rates per \$10 of Daily Benefit Benefit Periods*

	365 Days	730 Days	1095 Days	1460 Days	1825 Days	2190 Days	Unlimited
Nursing Home	65.63	87.53	106.70	120.89	137.53	160.79	206.11
Assisted Living Facility	21.87	29.18	35.56	40.29	45.84	53.59	68.70
Home Health Care	8.94	11.91	14.51	16.45	18.72	21.87	28.04

* Benefit Periods between years are interpolated between full year benefit periods

Example: Rate for a 1,000 day BP would be calculated as follows:

$730 \text{ day rate} \times (1095 - 1000) / (1095 - 730) + 1095 \text{ day rate} \times (1000 - 730) / (1095 - 730)$

$87.53 \times (95 / 365) + 106.70 \times (270 / 365) = 101.71$

Unlimited is assumed to be 3650 days for purposes of interpolating.

Elimination Period Factors

Benefit	Elimination Period										
	0 Day	20 Day	30 Day	50 Day	60 Day	90 Day	100 Day	120 Day	150 Day	180 Day	365 Day
NH and ALF	1.43	1.33	1.28	1.20	1.17	1.02	1.00	0.97	0.92	0.87	0.82
HHC	2.50	2.20	1.93	1.50	1.35	1.05	1.00	0.88	0.75	0.55	0.50

Continental General Insurance Company
Policy Form: 4LTCIP0001 (PA)

Age Factors

Issue Age	Non-Lifetime Benefit Periods	Lifetime Benefit Period
18 - 25	0.28	0.27
26	0.29	0.28
27	0.30	0.29
28	0.31	0.30
29	0.31	0.30
30	0.32	0.31
31	0.32	0.31
32	0.33	0.32
33	0.34	0.33
34	0.34	0.33
35	0.35	0.34
36	0.35	0.34
37	0.36	0.35
38	0.37	0.36
39	0.38	0.37
40	0.39	0.38
41	0.40	0.39
42	0.41	0.40
43	0.43	0.42
44	0.45	0.44
45	0.48	0.46
46	0.50	0.48
47	0.52	0.50
48	0.54	0.52
49	0.57	0.54
50	0.59	0.56
51	0.62	0.58
52	0.64	0.60
53	0.68	0.63
54	0.72	0.67
55	0.75	0.70
56	0.79	0.73
57	0.83	0.77
58	0.86	0.80
59	0.90	0.84
60	0.93	0.88
61	0.97	0.94
62	1.00	1.00
63	1.10	1.11
64	1.21	1.21
65	1.31	1.32
66	1.42	1.43
67	1.52	1.53
68	1.70	1.72
69	1.87	1.90
70	2.05	2.09
71	2.22	2.27
72	2.40	2.45
73	2.75	2.90
74	3.10	3.35
75	3.45	3.80
76	3.80	4.25
77	4.15	4.70
78	4.72	5.16
79	5.29	5.62
80	5.86	6.08
81	6.43	6.54
82	7.00	7.00
83	7.96	7.96
84	8.77	8.77
85	9.29	9.19
86	9.74	9.53
87	10.40	10.18
88	11.06	10.82
89	11.70	11.45
90	12.35	11.95
91	13.00	12.58
92	13.66	13.22
93	14.33	13.87
94	15.01	14.53
95	17.13	16.39
96	18.27	17.52
97	19.34	18.59
98	20.39	19.65
99	21.45	20.71
100	22.50	21.76

Continental General Insurance Company

Policy Form: 4LTCIP0001 (PA)

Rider Forms: 4LTCIE0001-ACC, 4LTCIE0001-PDNH, 4LTCIE0001-ENH, 4LTCIE0001-MHC, 4LTCIE0001-EHHC, 4LTCIE0001-NFB, 4LTCIE0001-DWP, 4LTCIE0001-JC

(Cost of Module is a Percentage of Premium)

Module Name		Rate	
Accelerated Payment Option (4LTCIE0001-ACC)			
5 years	+	45%	of the total rate
10 years	+	25%	of the total rate
Prescription Drug Benefit In A Nursing Home (4LTCIE0001-PDNH)			
1X Daily Benefit Per Month	+	3.0%	of the NH rate including any BIO selected
2X Daily Benefit Per Month	+	7.0%	of the NH rate including any BIO selected
3X Daily Benefit Per Month	+	10.0%	of the NH rate including any BIO selected
Nursing Home Enhancement Rider (4LTCIE0001-ENH)	+	3.0%	of the NH rate including any BIO selected
Nursing Home Indemnity Payment			
Lifetime Waiver of Premium			
NH Restoration of Benefits			
Monthly HHC (4LTCIE0001-MHC)	+	35.0%	of the HC rate including any BIO selected
Alternative Payment Benefit			
15X Daily Benefit Per Month	+	27.0%	of the HC rate including any BIO selected
Home Health Care Enhancement Rider (4LTCIE0001-EHHC)	+	10.0%	of the HC rate including any BIO selected
Therapeutic Device			
Medical Alert			
Home Modification			
Shortened Benefit Period (4LTCIE0001-NFB)	+	10.0%	of the Entire rate
Dual Waiver of Premium (4LTCIE0001-DWP)	+	4.0%	of the NH rate including any BIO selected
Joint Policy (4LTCIE0001-JC)	-	15.0%	of the Entire rate
Rate Guarantee			
4 - 10 Year Rate Guarantee	+	1.0%	Per Year beyond year 3 (eg 8 Yr = 5%)
11 - 20 Year Rate Guarantee	+	1.5%	Per Year beyond year 3 (eg 18 Yr = 22.5%)

Great American Life Insurance Company

Policy Form: 4LTCIP0001

Rider Forms: 4LTCIE0001-SWP10, 4LTCIE0001-FSWP and 4LTCIE0001-FROB

Survivorship - Paid Up Benefit Rider

Issue Age	Minimum Number of	
	0/0	10/10
< 66	12.0%	7.0%
>= 66	17.0%	7.0%

Full Restoration of Benefits

Maximum Benefit Period	Percent Increase
< 2.5 Years	6.0%
greater than or equal to 2.5 but < 3.5 Years	4.0%
greater than or equal to 3.5 but < 4.5 Years	3.0%
greater than or equal to 4.5 but < 5.5 Years	2.0%
greater than or equal to 5.5 Years but < Unlimited	1.0%

Continental General Insurance Company
Policy Form: 4LTCIP0001 (PA)

Limited Payment Factors

Issue Age	1 Pay	5 Pay	10 Pay	15 Pay	20 Pay	Paid Up at 65
18 - 25	64.64	13.04	6.71	4.79	3.68	1.59
26	62.41	12.59	6.48	4.62	3.55	1.62
27	60.33	12.17	6.24	4.47	3.43	1.65
28	59.15	11.93	6.14	4.38	3.37	1.69
29	58.01	11.70	6.03	4.29	3.30	1.72
30	56.92	11.48	5.91	4.21	3.24	1.75
31	55.86	11.27	5.80	4.14	3.18	1.78
32	54.85	11.06	5.70	4.06	3.12	1.81
33	53.87	10.86	5.60	3.99	3.06	1.84
34	52.92	10.67	5.50	3.91	3.01	1.88
35	52.01	10.49	5.40	3.84	2.95	1.91
36	51.13	10.31	5.31	3.79	2.90	1.97
37	50.28	10.14	5.22	3.72	2.85	2.04
38	48.92	9.88	5.08	3.62	2.80	2.10
39	47.82	9.68	4.98	3.56	2.76	2.16
40	46.73	9.47	4.89	3.50	2.72	2.23
41	45.61	9.29	4.79	3.46	2.70	2.26
42	44.50	9.10	4.70	3.40	2.67	2.30
43	42.94	8.83	4.54	3.30	2.60	2.37
44	41.37	8.55	4.40	3.21	2.55	2.43
45	39.82	8.26	4.25	3.11	2.49	2.49
46	38.28	7.98	4.11	3.02	2.42	2.55
47	36.81	7.70	3.96	2.92	2.36	2.61
48	35.44	7.47	3.84	2.85	2.31	2.65
49	34.15	7.24	3.73	2.79	2.27	2.68
50	33.00	7.02	3.62	2.72	2.23	2.72
51	31.50	6.80	3.52	2.65	2.19	2.80
52	30.52	6.59	3.40	2.59	2.14	2.87
53	29.24	6.33	3.26	2.48	2.07	2.94
54	28.09	6.10	3.14	2.39	1.99	3.02
55	27.23	5.92	3.08	2.33	1.93	3.08
56	26.06	5.67	2.95	2.25	1.85	3.17
57	24.81	5.42	2.85	2.15	1.77	3.84
58	23.94	5.27	2.79	2.12	1.77	4.21
59	22.88	5.07	2.71	2.07	1.75	4.55
60	22.14	4.93	2.66	2.05	1.74	4.93
61	21.23	4.76	2.62	2.05	1.75	
62	20.59	4.66	2.59	2.04	1.76	
63	19.23	4.35	2.43	1.91	1.65	
64	18.21	4.13	2.31	1.82	1.57	
65	17.31	3.93	2.21	1.74	1.50	
66	16.53	3.77	2.14	1.69	1.46	
67	15.93	3.64	2.07	1.64	1.41	
68	14.70	3.36	1.92	1.52	1.31	
69	13.81	3.16	1.81	1.44	1.24	
70	13.08	3.05	1.70	1.36	1.21	
71	12.56	2.93	1.65	1.32	1.18	
72	12.05	2.82	1.59	1.28	1.15	
73	11.44	2.69	1.50	1.25	1.14	
74	10.86	2.56	1.47	1.24	1.13	
75	10.37	2.45	1.44	1.22	1.13	
76	9.79	2.33	1.41	1.20	1.12	
77	9.21	2.19	1.37	1.19	1.12	
78	8.95	2.14	1.35	1.18	1.11	
79	8.80	2.11	1.33	1.17	1.11	
80	8.56	2.06	1.30	1.16	1.11	
81	8.40	2.02	1.28	1.15	1.11	
82	8.15	1.96	1.26	1.14	1.11	
83	8.18	1.98	1.25	1.13	1.11	
84	8.13	1.97	1.24	1.13	1.10	
85	8.15	1.99	1.22	1.12	1.10	
86	8.11	1.98	1.21	1.12	1.10	
87	8.13	1.99	1.20	1.11	1.10	
88	8.19	1.98	1.19	1.10	1.09	
89	8.15	1.96	1.17	1.09	1.08	
90	8.21	1.96	1.16	1.08	1.07	
91	8.26	1.95	1.15	1.07	1.06	
92	8.31	1.95	1.14	1.06	1.05	
93	8.36	1.94	1.12	1.05	1.04	
94	8.40	1.94	1.11	1.04	1.03	
95	8.45	1.93	1.10	1.03	1.03	
96	8.50	1.93	1.09	1.02	1.02	
97	8.55	1.92	1.07	1.01	1.01	
98	8.60	1.90	1.07	1.01	1.01	
99	8.64	1.89	1.06	1.01	1.01	
100 +	8.69	1.87	1.06	1.01	1.01	

Continental General Insurance Company
Policy Form: 4LTCIP0001 (PA)
Rider Forms: 4LTCIE0001-FROP, 4LTCIE0001-ROP and 4LTCIE0001-GROP

Return of Premium

Issue Age	Full No Max	Less Clms No Max	Less Clms Graded
18 - 25	22%	14%	13%
26	23%	15%	13%
27	24%	16%	13%
28	25%	17%	13%
29	26%	18%	13%
30	27%	19%	13%
31	28%	20%	13%
32	29%	21%	13%
33	30%	22%	13%
34	31%	23%	13%
35	32%	24%	13%
36	33%	25%	13%
37	34%	26%	13%
38	35%	27%	13%
39	36%	28%	13%
40	37%	29%	13%
41	39%	30%	13%
42	40%	31%	13%
43	42%	33%	13%
44	43%	34%	13%
45	45%	35%	13%
46	47%	36%	13%
47	49%	37%	13%
48	51%	39%	13%
49	53%	41%	13%
50	56%	42%	13%
51	59%	44%	13%
52	62%	46%	13%
53	65%	48%	13%
54	68%	50%	13%
55	71%	52%	12%
56	75%	55%	11%
57	79%	57%	10%
58	82%	59%	9%
59	85%	61%	9%
60	89%	63%	8%
61	93%	65%	8%
62	98%	67%	7%
63	103%	70%	6%
64	108%	73%	5%
65	114%	76%	5%
66	121%	80%	4%
67	129%	83%	3%
68	136%	87%	3%
69	145%	91%	2%
70	154%	95%	2%
71	164%	100%	1%
72	175%	105%	1%
73	189%	110%	1%
74	204%	116%	1%
75	219%	122%	
76	234%	128%	
77	247%	132%	
78	258%	136%	
79	268%	139%	
80	276%	142%	
81	285%	145%	
82	294%	148%	
83	302%	150%	
84	309%	153%	
85	317%	155%	
86	328%	159%	
87	347%	164%	
88	371%	170%	
89	400%	178%	
90	434%	186%	
91	475%	195%	
92	523%	204%	
93	577%	214%	
94	638%	224%	
95	706%	234%	
96	782%	244%	
97	867%	254%	
98	961%	263%	
99	1063%	272%	
100 +	1174%	281%	

Continental General Insurance Company
Policy Form: 4LTCIP0001 (PA)
Rider Forms: 4LTCIE0001-SBIO, 4LTCIE0001-CBIO, 4LTCIE0001-DBIO and 4LTCIE0001-GPO

Benefit Increase Options

Issue Age	Simple BIO Unlimited 5%	Unlimited 5%	Compound BIO 2x Max 5%	3x Max 5% DB 3% LT Max	Delayed BIO	Guaranteed Purchase Option
18-25	81%	316%	24%	78%	220%	11%
26	81%	312%	27%	84%	216%	14%
27	80%	307%	30%	91%	213%	17%
28	80%	302%	33%	97%	210%	20%
29	79%	298%	36%	103%	207%	23%
30	79%	293%	39%	109%	209%	26%
31	79%	289%	41%	115%	206%	29%
32	78%	284%	44%	120%	203%	31%
33	78%	279%	46%	125%	199%	34%
34	77%	275%	49%	131%	196%	36%
35	77%	270%	51%	135%	193%	38%
36	77%	265%	53%	140%	190%	41%
37	76%	261%	55%	145%	186%	43%
38	76%	256%	57%	149%	183%	45%
39	75%	252%	58%	153%	180%	46%
40	75%	247%	60%	157%	183%	48%
41	75%	241%	63%	157%	179%	50%
42	75%	236%	62%	158%	175%	52%
43	75%	232%	63%	160%	172%	54%
44	74%	227%	64%	160%	168%	55%
45	74%	222%	65%	161%	167%	56%
46	73%	218%	66%	162%	164%	58%
47	73%	213%	68%	161%	160%	61%
48	72%	210%	69%	162%	158%	63%
49	72%	207%	70%	167%	156%	65%
50	71%	203%	71%	163%	156%	67%
51	71%	199%	72%	163%	153%	71%
52	71%	196%	73%	163%	152%	74%
53	70%	192%	74%	163%	149%	77%
54	69%	187%	74%	161%	146%	79%
55	69%	182%	75%	159%	142%	82%
56	68%	177%	76%	157%	140%	84%
57	68%	173%	78%	155%	138%	90%
58	67%	167%	79%	152%	136%	94%
59	65%	160%	79%	147%	131%	98%
60	64%	155%	80%	145%	129%	102%
61	63%	149%	80%	140%	125%	107%
62	62%	143%	81%	136%	121%	113%
63	62%	134%	79%	129%	116%	117%
64	63%	125%	78%	121%	109%	119%
65	63%	116%	77%	114%	102%	
66	63%	107%	76%	106%	95%	
67	63%	99%	74%	99%	88%	
68	61%	93%	73%	93%	83%	
69	58%	87%	71%	87%	78%	
70	55%	82%	69%	82%	74%	
71	52%	76%	68%	76%	68%	
72	50%	70%	66%	70%	63%	
73	47%	66%	63%	66%	60%	
74	45%	62%	61%	62%	56%	
75	43%	57%	57%	57%	52%	
76	40%	53%	53%	53%	48%	
77	38%	49%	49%	49%	45%	
78	36%	46%	46%	46%	42%	
79	34%	43%	43%	43%	40%	
80	32%	40%	40%	40%	37%	
81	30%	37%	37%	37%	35%	
82	28%	34%	34%	34%	32%	
83	27%	32%	32%	32%	30%	
84	26%	31%	31%	31%	29%	
85	25%	29%	29%	29%	27%	
86	24%	27%	27%	27%	26%	
87	22%	26%	26%	26%	25%	
88	22%	25%	25%	25%	24%	
89	21%	24%	24%	24%	23%	
90	20%	22%	22%	22%	21%	
91	19%	21%	21%	21%	20%	
92	18%	20%	20%	20%	19%	
93	17%	19%	19%	19%	19%	
94	17%	18%	18%	18%	18%	
95	16%	18%	18%	18%	18%	
96	15%	17%	17%	17%	17%	
97	15%	16%	16%	16%	16%	
98	14%	15%	15%	15%	15%	
99	14%	15%	15%	15%	15%	
100 +	13%	14%	14%	14%	14%	

Continental General Insurance Company
Policy Form: 4LTCIP0001 (PA)

Rider Form: 4LTCIE0001-COIN

Discount Available for 80/20 Coinsurance Program

Lifetime	Out of Pocket Maximum										
Maximum	<u>\$10,000</u>	<u>\$20,000</u>	<u>\$25,000</u>	<u>\$30,000</u>	<u>\$35,000</u>	<u>\$40,000</u>	<u>\$50,000</u>	<u>\$75,000</u>	<u>\$100,000</u>	<u>\$125,000</u>	<u>\$150,000</u>
\$50,000	10%										
\$75,000	9%										
\$100,000	5%	11%									
\$125,000	2%	11%	20%	20%							
\$150,000	1%	11%	15%	17%	20%						
\$175,000		10%	14%	16%	17%	20%					
\$200,000		8%	12%	15%	16%	18%					
\$225,000		6%	10%	14%	15%	17%	20%				
\$250,000		4%	7%	12%	14%	16%	19%				
\$275,000		1%	7%	10%	12%	15%	18%				
\$300,000		1%	6%	8%	10%	14%	18%				
\$325,000			4%	7%	9%	13%	17%	20%			
\$350,000			3%	6%	8%	11%	16%	19%			
\$375,000			1%	4%	8%	10%	16%	19%			
\$400,000				3%	7%	9%	15%	18%			
\$425,000				2%	5%	8%	14%	18%	20%		
\$450,000				1%	4%	7%	12%	18%	19%		
\$475,000			1%		3%	6%	10%	17%	19%		
\$500,000					2%	4%	9%	17%	18%		
\$525,000					1%	3%	8%	17%	18%	20%	
\$550,000						2%	7%	17%	18%	20%	
\$575,000						1%	6%	16%	17%	19%	
\$600,000						1%	5%	16%	17%	19%	
\$625,000						1%	4%	15%	17%	18%	20%
\$650,000							3%	13%	17%	18%	20%
\$675,000							2%	12%	17%	18%	19%
\$700,000							1%	10%	17%	18%	19%
\$725,000							1%	9%	17%	18%	19%
\$750,000							1%	8%	17%	18%	19%
\$775,000							1%	7%	17%	18%	19%
\$800,000								7%	16%	17%	18%
\$825,000								6%	15%	17%	18%
\$850,000								6%	13%	17%	18%
\$875,000								5%	12%	17%	18%
\$900,000								4%	11%	17%	18%
\$925,000								2%	10%	17%	18%
\$950,000								1%	9%	17%	18%
\$975,000								1%	8%	17%	17%
\$1,000,000								1%	8%	17%	17%

- indicates a cell where the program is not applicable.
 Rates for options between those listed above may be calculated by interpolating between the factors listed.

SERFF Tracking #:	GLTC-132449586	State Tracking #:	GLTC-132449586	Company Tracking #:	4LTCI RATE INCREASE FILING 2020
State:	Pennsylvania	Filing Company:	Continental General Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	4LTCI RATE INCREASE FILING 2020/				

Supporting Document Schedules

Bypassed - Item:	Transmittal Letter (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Actuarial Certification (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	
Attachment(s):	4LTCI Cover Letter - 2020 - PA.pdf 4LTCI Actuarial Memorandum - 2020 - PA.pdf 4LTCI Appendices - 2020 - PA.pdf Generic RINC Letter - 4LTC 2020.pdf Managing Long-Term Care Risk - 2020.01.pdf 4LTCI Exhibits - 2020 - PA.pdf 4LTCI Exhibits - PA.xlsx
Item Status:	
Status Date:	
Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	Continental General Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	4LTCI RATE INCREASE FILING 2020/		

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Rate Table (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Advertisement Compliance Certification
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Reserve Calculation (A&H)
Comments:	Please see Section 13 of the Actuarial Memorandum.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #:	GLTC-132449586	State Tracking #:	GLTC-132449586	Company Tracking #:	4LTCI RATE INCREASE FILING 2020
<hr/>					
State:	Pennsylvania			Filing Company:	Continental General Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	4LTCI RATE INCREASE FILING 2020/				

Attachment 4LTCI Exhibits - PA.xlsx is not a PDF document and cannot be reproduced here.



P.O. Box 203098
Austin, TX 78720-3098
Toll Free: (866) 830-0607
Fax: (888) 769-0737

July 8, 2020

Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

RE: Continental General Insurance Company
NAIC No: 71404
Rate Revision Filing on Individual Long-Term Care Insurance
Policy Forms: 4LTCIP0001
SERFF Tracking Number: GLTC-132449586

Dear Sir or Madam:

Enclosed for your review, please find copies of an Actuarial Memorandum and rate sheets in support of the current proposed increases on the above-referenced Long-Term Care Insurance products.

The base rate increase applies to the base policy and all applicable benefit riders for which a premium is paid. The rate increase will be effective on the first premium due date subsequent to state insurance department approval and in accordance with state policyholder notification requirements, with the additional condition that no policyholder will receive a rate increase sooner than one year after receiving a prior rate increase, if applicable.

This filing applies to inforce policies issued in this state. The above referenced policy forms are Individual Long-Term Care insurance products, which are no longer being sold.

Enclosed are any necessary certifications, transmittals, and/or filing fees as may be required by your state. I hope that with this information your approval of this filing will be forthcoming. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth A. O'Brien', is written over a horizontal line.

Elizabeth A. O'Brien, FSA, MAAA
Associate Actuary
Continental General Insurance Company
11001 Lakeline Blvd, Suite 120
Austin, Texas 78717

PA

Long-term care administrator for:
Great American Life Insurance Company®
Loyal American Life Insurance Company®

Continental General Insurance Company

P.O. Box 203098
Austin, Texas 78720-3098

**Actuarial Memorandum Supporting Rate Revisions for
Long Term Care Insurance Base Policy Forms and Riders Associated with
4LTCIP0001**

1 SCOPE AND PURPOSE

The purpose of this memorandum is to provide actuarial information supporting a rate revision to the Base Policy Forms and Riders of the Continental General Insurance Company (the Company) long-term care (LTC) policy form referenced above.

These policies were originally sold under the name Great American Life Insurance Company (GALIC). Virtually all of the GALIC policies have been novated into United Teacher Associates (UTA), and the remaining GALIC policies are 100% ceded to UTA. All policies issued in Florida are 100% ceded to GALIC and therefore are excluded from this analysis. Effective December 31, 2016, UTA (inactive NAIC No: 63479) merged into Continental General Insurance Company (active NAIC No: 71404).

Some riders may not be available in all states. The issue date range associated with premium-paying lives in this state is shown in Appendix A.

These forms are no longer being marketed in any state and the Company is no longer selling any new Long-Term Care Insurance.

The Company is requesting an 15% rate increase in your state at this time.

This rate filing is not intended to be used for other purposes.

The body of this actuarial memorandum was written to apply to each state where these products were issued. Any reference to information that is specific to a particular state is included in Appendix A.

Please refer to Section 21 for a description of the information contained in each Appendix.

2 POLICYHOLDER OPTIONS TO MITIGATE IMPACT OF PREMIUM RATE INCREASE

Optional Policyholder offers to Reduce Benefits

The Company will give policyholders Benefit Reduction Offers to help mitigate the impact to policyholders of the premium rate increase on the base policy and riders. The Benefit Reduction Offers will allow the policyholder to:

1. Lower their lifetime maximum benefit,
2. Lower their daily benefit, or
3. Increase their elimination period.

Non-forfeiture Offers

In addition, the Company will give the policyholder the option to accept a shortened benefit period. Acceptance of the non-forfeiture benefit will provide the policyholder with a paid-up policy, with no

future premiums required. Under this paid-up policy, the maximum benefit amount is equal to the greater of the sum of premiums paid or 30 times their daily benefit, and the daily benefit amount is equal to the policyholder's current daily benefit amount. This non-forfeiture benefit shall not exceed the policyholder's remaining unused Maximum Lifetime Benefit at the time of conversion. Upon acceptance of this offer, an endorsement reflecting the non-forfeiture benefit will be sent to the policyholder. This offer will be made to all policyholders.

If applicable, for policyholders with active Limited Pay policy provisions, the Company will additionally provide policyholders an opportunity to elect a reduced paid-up policy in accordance with state regulatory requirements.

3 PREMIUM RATE INCREASE JUSTIFICATION

This rate revision is necessary because the current best estimate projections of the nationwide lifetime loss ratios are in excess of expected. Policies were issued nationwide under both loss ratio requirements and under rate stabilization requirements established in the 2000 LTC NAIC Model Regulation.

The lifetime loss ratios anticipated at the time of original pricing for these policy forms is 61.0%. This loss ratio has been stated based on the original pricing interest rate of 4.0%. Based on available documentation, the pricing loss ratio stated below is conservatively assumed to be representative of best estimate expectations.

For policies issued under loss ratio requirements, the lifetime loss ratio that these products were initially priced to has been exceeded. For policies issued under rate stabilization requirements, the margin for moderately adverse deviation built into the rates at the time of original pricing was a 10% deviation in the lifetime loss ratio, when compared to originally expected. This margin has been exceeded.

Consistent with the discussions and final document produced by the NAIC Pricing Subgroup's ("Long-term Care Insurance Approaches to Reviewing Premium Rate Increases"), the Company is providing analysis based on the modified prospective present value approach to determine the level of rate increase requested. This modified approach recognizes that past premium rate increases were not adequate and relies on the original pricing assumptions to catch-up on past premium rate increases.

The cumulative rate increase indicated by the modified prospective present value formula is calculated as:

$$\text{Cumulative rate increase \%} = \frac{\Delta PV(\text{future incurred claims}) - (0.58)\Delta PV(\text{future earned premiums})}{(0.85)PV_{\text{current}}(\text{future earned premiums})}$$

The ΔPV indicates the change in present value due to the change in actuarial assumptions between original assumptions and current moderately adverse assumptions. The formula is applied to nationwide experience that has been restated to the original rate level. Please note that experience associated with lives that are currently in a paid-up status has been excluded from the calculation. Moderately adverse assumptions are defined as best estimate assumptions as described in Section 10, plus a 10% load to future incurred claims.

State-specific justified rate increases are calculated to achieve equity across states with respect to the total amount of rate increases that will have been implemented in each state. In order to calculate the rate increase needed for this state specifically, the following formula was used:

$$\frac{1 + \text{Cumulative Rate Increase}}{1 + \text{State Specific Cumulative Rate Increase to Date}} - 1$$

4 DESCRIPTION OF BENEFITS

Appendix B contains a brief summary of the benefits contained in these base forms and associated riders. A complete description of the benefit provisions and conditions for eligibility is contained in the policy forms and riders on file with the state.

5 RENEWABILITY CLAUSE

All products are Guaranteed Renewable, Individual Long-Term Care policies.

6 MARKETING METHOD

All forms were marketed to individuals by licensed agents. These products are not currently being marketed.

7 APPLICABILITY

The revised rates contained in this memorandum will be applicable to all renewals of the policy form and riders described in Section 1 as well as all future periodic inflation protection offers. The current and revised premium rate schedules are attached. The rate revision will be applied as a consistent percentage to all premium classes. The modal premium factors will remain unchanged from the current factors.

8 PROPOSED EFFECTIVE DATE

Policyholder notification of the rate increases will begin as soon as possible subject to state insurance department approval with the additional condition that no policyholder will receive the rate increases sooner than one year after receiving a previous rate increase.

9 UNDERWRITING

Most policies subject to this rate revision were subject to full medical underwriting in accordance with Company standards in place at the time of issue. Some policies sold under 4LTCIP0001 were subject to simplified underwriting. The underwriting standards used were taken into consideration when projecting future experience.

10 ACTUARIAL ASSUMPTIONS

The actuarial assumptions used to project the future premiums and claims are described in this section. Appendix D provides further details of the experience studies conducted that were used to develop the actuarial assumptions. These base assumptions are the same as the assumptions being used in the Company's internal cash flow testing.

A Morbidity

The morbidity assumptions are based on a combination of the Company's historical claim experience on these forms from 2006 through 6/30/2018, the Milliman 2017 Long-Term Care Guidelines (Guidelines) and judgment. The claim cost assumptions reflect the Company's current best estimate of future morbidity. In setting the morbidity assumptions, the policy design, underwriting and claim adjudication practices have been taken into consideration. The baseline assumptions do not include any adverse selection resulting from the rate increase, loads for moderately adverse experience, or future morbidity improvement.

B Mortality

The best estimate future mortality assumption is 100% of the Individual Annuity Mortality (IAM) 2012 Base table with mortality steepening factors, selection factors, and other attained age adjustments.

C Voluntary Lapse

The voluntary lapse assumptions were developed from a policy persistency study conducted on the Company's experience on these forms and judgment. Lapse rates are combined with mortality rates and benefit exhaust rates to derive the total termination rate. We assumed all remaining policies would terminate at attained age 120. The lapse assumptions represent the best estimate expectations of future experience and do not include any provisions for adverse experience. Voluntary lapse rates vary by marital status and inflation versus non-inflation.

The table below shows the detailed voluntary lapse assumptions for the applicable projected policy durations.

Voluntary Lapse Rate				
	Married		Single	
Duration	Inflation	Non-Inflation	Inflation	Non-Inflation
9	0.93%	1.21%	1.48%	3.68%
10	0.62%	0.87%	1.48%	2.92%
11	0.52%	0.72%	1.33%	2.54%
12	0.52%	0.72%	1.17%	2.35%
13	0.41%	0.58%	1.02%	2.03%
14	0.36%	0.48%	0.87%	1.78%
15+	0.31%	0.39%	0.77%	1.46%

Additional multiplier to apply to Lapse Rates for Gender	
Gender	Multiplier
Female	82.5%
Male	140.0%

For limited pay policies, voluntary lapse rates were assumed to be zero after the premium payment period.

Voluntary lapse assumptions include an NFO conversion rate which is calculated as 19% of the requested rate increase, capped at 19%.

D Interest Rate

The supporting exhibits use the average maximum valuation interest rate of 4.0% to calculate the lifetime loss ratio.

E Expenses

The need for a rate increase is based on the modified prospective present value formula. Expenses are not accounted for in the modified prospective present value formula and therefore are not used as justification for the rate increase. As such, expenses are not being projected and are not included in this filing.

11 ISSUE AGE RANGE

These products were available for issue ages 18 to 84. Premiums are based on issue age.

12 AREA FACTORS

The Company did not use area factors within the state in the premium scale for these products.

13 CLAIM LIABILITY AND RESERVE

Claim reserves were calculated using appropriate actuarial methods for Incurred But Not Reported reserves (IBNR) and using continuance curves validated for the Company's experience for open claims on a disabled life basis. The claim reserves were discounted to the incurred date for each claim and have been included in the historical incurred claims.

14 ACTIVE LIFE RESERVES

Incurred claims are calculated without the impact of the change in active life reserves.

15 DISTRIBUTION OF BUSINESS

The historical experience reflects the actual distribution of policies during the experience period. The projected future experience is based on a seriatim projection of the current inforce policies. See Appendix C for the distribution of the inforce policies by key demographic and benefit characteristics.

16 NUMBER OF POLICYHOLDERS

Please refer to Appendix A for the current number of premium-paying policyholders as of 9/30/2019 in this state.

17 AVERAGE ANNUAL PREMIUM

The average annual premium for these products both prior to the impact of the requested rate increase, and after, is indicated in Appendix A.

18 HISTORY OF RATE ADJUSTMENTS

Please refer to Appendix A for the history of rate adjustments on these products in this state.

19 EXPERIENCE – PAST AND FUTURE

Nationwide historical experience since inception by issue year within calendar year for these policy forms and riders as of 9/30/2019 is contained in Exhibit 2a. Experience for loss years 2019 and prior are developed through 9/30/2019. In these exhibits, please note that the paid claims have been discounted with interest from the claim payment date back to the incurred date of the claim.

Historical nationwide experience for all policies issued under these products is contained in Exhibit 3a. The nationwide historical and projected experience adjusted to reflect the state's specific rate increase history, both with and without the impact of the requested rate increase, is also contained in Exhibit 3a. Projected experience utilizes best estimate assumptions.

Historical nationwide experience for policies in premium-paying status is contained in Exhibit 3b. The nationwide historical and projected experience adjusted to reflect the state's specific rate increase history, both with and without the impact of the requested rate increase, is also contained in Exhibit 3b. Projected experience utilizes best estimate assumptions.

In developing the projected future experience with the rate increase, an implementation date of 4/1/2021 was assumed.

20 RELATIONSHIP OF RENEWAL PREMIUM TO NEW BUSINESS PREMIUM

The Company is no longer selling any new Long-Term Care business. Therefore, the comparison of renewal premium rates after the rate increase to the Company's current new business premium rate schedule is not applicable.

21 SUMMARY OF APPENDICES

Appendix A contains information that is specific to the state in which this filing is made, such as the average annual premium, the number of policyholders inforce, etc. Similar information for nationwide is also contained in this Appendix.

Appendix B contains a summary of the benefits included under each policy form grouping.

Appendix C contains a summary of the demographic distributions of the inforce policies as of 9/30/2019.

Appendix D contains a detailed summary of the development of the projection assumptions.

Appendix E contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

22 SUMMARY OF EXHIBITS

Exhibit 1 contains the breakdown of policy counts, annualized premium, and average premium for all inforce policies by state under each product grouping as of the inforce date.

Exhibit 2a contains the historical nationwide lifetime experience for all policies issued under these products by issue year within calendar year.

Exhibit 2b contains the historical state-specific lifetime experience for all policies issued under these products by issue year within calendar year.

Exhibit 3a contains historical and projected nationwide experience for all policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the proposed rate increase. Projected experience utilizes best estimate assumptions. Historical experience is shown before and after adjusting for this state's specific rate history.

Exhibit 3b contains historical and projected nationwide experience for premium-paying policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the proposed rate increase. Projected experience utilizes best estimate assumptions. Historical experience is shown before and after adjusting for this state's specific rate history.

Exhibit 4a contains historical and projected state-specific experience for all policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the proposed rate increase. Projected experience utilizes best estimate assumptions.

Exhibit 4b contains historical and projected state-specific experience for premium-paying policies issued under these products. The exhibit also includes the projected lifetime loss ratios both with and without the impact of the proposed rate increase. Projected experience utilizes best estimate assumptions.

Exhibit 5 contains nationwide experience for premium-paying policies, restated to the original rate level, using original assumptions and current moderately adverse assumptions.

Exhibit 6 contains the number of premium paying policyholders that will become eligible for the contingent benefit upon lapse (CBUL) at the state-specific level.

Exhibit 7 contains a state-by-state summary of the status of this rate filing.

Exhibit 8 demonstrates the lifetime loss ratios if all premiums are restated since inception to the current Pennsylvania rate levels. Waiver of premium and return of premium benefits are included in the incurred claims and the associated premium is included in earned premium.

23 ELIGIBILITY FOR CONTINGENT BENEFIT UPON LAPSE

Exhibit 6 has been provided to demonstrate the number of premium paying policyholders that will become eligible for the contingent benefit upon lapse (CBUL). Policyholders are defined as being eligible given they are governed by rate stability regulations and they have surpassed the cumulative rate increase threshold given this request.

Given that policyholders in this state will become eligible for the CBUL, the attached document (Managing Long Term Care Risk - 2020), provided by the Company's Chief Operating Officer, provides a demonstration that the Company has appropriate policy administration and claim processing procedures in place to assure our policyholders' long-term care claims are paid according to the provisions of our contracts.

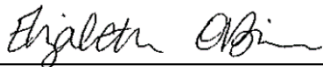
24 ACTUARIAL CERTIFICATION

In performing the analysis, preparing this filing, and rendering the actuarial opinion below, I relied upon other actuaries for experience analysis used to develop baseline actuarial assumptions related to morbidity and persistency. I reviewed the analysis for reasonableness and consistency, but I did not perform a detailed audit. The assumptions are appropriate for the purpose used.

To the best of my knowledge and judgment this rate filing is in compliance with the applicable laws and regulations of this state as they relate to premium rate developments and revisions. This memorandum complies with all applicable Actuarial Standards of Practice, including Actuarial Standards of Practice No. 8 "Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits," No. 18 "Long-Term Care Insurance," and No. 23 "Data Quality."

I have reviewed and taken into consideration the policy design and coverage provided, and the Company's original underwriting and claims adjudication processes.

In my opinion, the rates are not excessive or unfairly discriminatory, and the benefits are reasonable in relation to the premiums. The anticipated lifetime loss ratio exceeds the applicable required loss ratio. If the requested increase is implemented and the underlying moderately adverse assumptions are realized, no further premium rate schedule increases are anticipated at this time. The Company will continue to monitor experience and reserves the right to take additional rate action if necessary.



Elizabeth A. O'Brien, FSA, MAAA
Associate Actuary
Continental General Insurance Company
11001 Lakeline Blvd, Suite 120
Austin, Texas 78717

Appendix A
Continental General Insurance Company
4LTCIP0001

Pennsylvania

Requested Rate Increase = 15%

Issue Date Range (Section 1 in Actuarial Memorandum)

Pennsylvania	1/16/2007	to	1/1/2010
Nationwide	2/27/2006	to	3/1/2010

Rate Stabilization Date for Pennsylvania 9/16/2002

Number of Premium-Paying Policyholders and Annualized Premium as of September 30, 2019

Number of premium-paying lives in Pennsylvania	
Issued prior to Rate Stabilization	0
Issued on or after Rate Stabilization	364
Average issue age	60

	Policies	Premium
Pennsylvania	364	\$ 985,509
Nationwide	8,092	\$ 15,379,896

Average Annual Premium (Section 17 in Actuarial Memorandum)

The average annual premium for this form and associated riders, prior to the current rate increase and assuming full implementation of all previously approved rate increases, is:

Pennsylvania	3,262
Nationwide	2,085

The average annual premium for this form and associated riders in Pennsylvania, including the impact of the requested rate increase, is: 3,751

Rate Increase History (Section 18 in Actuarial Memorandum)

Approved Rate Changes include: 15% in 2014, 20% in 2016, 20% in 2018, 20% in 2019.

Lifetime Loss Ratio - Exhibit 3a

The Lifetime Loss Ratio without the requested rate increase is:	72.2%
The Lifetime Loss Ratio with the requested rate increase is:	67.8%

Appendix B
Continental General Insurance Company
Description of Benefits

A brief summary of the benefits contained in the base forms and associated riders is provided below. A complete description of the benefit provisions and conditions for eligibility is contained in the policy forms and riders on file with the state.

Policy Form 4LTCIP0001

This policy is a comprehensive Long-Term Care policy covering nursing home care and home health care. The following benefits are included:

1. Nursing Home Benefit: Once the Elimination Period has been met, the actual charges incurred while the Insured Person is confined to a Nursing Home will be paid, up to the Maximum Daily Benefit.
2. Bed Reservation Benefit: When an Insured Person is absent for any reason other than discharge during a Nursing Home or Assisted Living confinement, we will (1) pay the actual charges incurred for room and board while the room is being reserved, up to the Maximum Daily Benefit, if the Elimination Period has been satisfied, (2) give credit toward the satisfaction of the Elimination Period where the absence occurs while the Elimination Period is being satisfied; or (3) a combination of (1) and (2).
3. Assisted Living Facility Benefit: The actual charges for room and board and necessary maintenance and personal care expenses incurred for each day while the Insured Person is confined to an Assisted Living Facility, up to the Maximum Daily Benefit, will be paid if treatment and/or services are received from a licensed, registered or certified Assisted Living Facility, as required.
4. Home Health Care and Adult Day Care Benefit: Once the elimination period has been met, the actual charges incurred for each day the Insured Person receives Home Health Care or Adult Day Care will be paid.
5. Monthly Cash Benefit Alternative: Once an Insured Person has met the benefit eligibility, the insurer will pay the Monthly Benefit in advance each calendar month. This benefit will also cover charges for skilled care in the Insured Person's Home. This benefit will be paid in lieu of all other benefits for care or services provided under this policy.
6. Respite Care Benefit: The actual charges incurred for Respite Care, up to the Respite Care Maximum Daily Benefit, will be paid if such treatment and/or services are received from a Nursing Home, Assisted Living Facility or in the Insured Person's Home.
7. Hospice Care Benefit: The actual charges incurred for each day an Insured Person receives Hospice Care, up to the Maximum Daily Benefit, will be paid by the insurer if it has been estimated by a doctor that the Insured Person has a life expectancy of 6 months or less and no reasonable prospect of cure and the treatment and/or services are received from a Hospice Care Provider.
8. Caregiver Training Benefit: The actual charges incurred for Caregiver Training of the Insured Person or a Volunteer Caregiver to assist an Insured Person, not to exceed the Maximum Lifetime Caregiver Training Benefit, will be paid by the insurer if:
 - (1) the Caregiver Training is in the Plan of Care; and
 - (2) Caregiver Training is not already provided free of charge by an equipment or supply vendor.

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Continental General Insurance Company
Description of Benefits

9. Independent Caregiver Certification Benefit: The insurer will pay for the training and certification of an Independent Caregiver if the training is:
 - (1) approved by a Personal Care Advisor; and
 - (2) agreed to by the Insured Person, the insurer and a Licensed Health Care Practitioner.
10. Waiver of Premium: Premiums will be waived on a monthly basis once the Elimination Period has been met and while the Insured Person is receiving Nursing Home, Assisted Living Facility, Home Health Care or Adult Day Care benefits.
11. Contingent Non-forfeiture Benefit – Shortened Benefit Period: In the event that premium rates increase to a level which results in a cumulative increase of the premium equal to or exceeding the percentage of the initial premium set forth in the Triggers for a Substantial Premium Increase table, the Insured Person will receive the Contingent Non-forfeiture benefit, and he or she may elect to:
 - (1) reduce current benefits; or
 - (2) during the 120 days following the Premium Due Date on which the increased premium would first have become due, convert his or her coverage as follows:
 1. the daily benefit amounts available will remain as they were at the time coverage would have lapsed under the policy; and
 2. the total benefit amount in force under this benefit will be equal to the amount of all premium paid, excluding waived premiums, for all coverage combined including this benefit. The minimum benefit will be 30 times the daily benefit in force at the time the policy would have lapsed.

The following optional benefits were also available:

1. Accelerated Payment of Premium Rider – 4LTCIE0001-ACC: The premium for the initial number of years listed on the Schedule Page will be increased by the additional charge for this rider. Following the initial number of years on the Schedule Page, the renewal premium will be reduced by 50%, subject to any changes to the policy after issue.
2. 80/20 Coinsurance Rider – 4LTCIE0001-COIN: By electing this rider, the Insured Person elects to pay 20% of the Daily Benefit amounts otherwise payable under this policy, up to the Benefit Copayment Limit. The Benefit Copayment Limit is 20% of the Policy Maximum Lifetime Benefit.
3. Dual Waiver of Premium Rider – 4LTCIE0001-DWP: When the spouse of an Insured Person is receiving the Waiver of Premium Benefit, the Insured Person's premiums will be waived if both the Insured Person and spouse are insured as a married couple on the same policy form series which includes this Dual Waiver of Premium Benefit.
4. Joint Coverage Rider – 4LTCIE0001-JC: Married couples can choose to purchase Joint Coverage. All benefit payments on the policy are applied against one Lifetime Maximum Benefit. The daily benefit is available to each insured, e.g., if both insureds are eligible for benefits, then a maximum of 2 times the daily benefit may be paid each day. The elimination period must be satisfied by each insured separately.
5. Survivorship Paid Up Benefit Rider – 4LTCIE0001-SWP10: The premiums for the surviving Insured Person will be waived, after the date of death of the spouse, if:

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- (1) The Insured Person and the spouse have coverage in force under this form series;
 - (2) The spouse dies while both policies are in force; and
 - (3) Death must not occur prior to the tenth policy anniversary and no claims can have been incurred prior to the tenth anniversary (see the 10/10 premium).
6. Full Survivorship Paid Up Benefit Rider – 4LTCIE0001-FSWP: The premiums for the surviving Insured Person will be waived, after the last of the following to occur: (1) the date of death of the spouse; or (2) the tenth anniversary of the effective date of this policy, if:
- (1) The Insured Person and the spouse have coverage in force under this form series; and
 - (2) The spouse dies while both policies are in force. (see the 0/0 premium)
7. Simple Benefit Increase Rider – 4LTCIE0001-SBIO: Every dollar benefit amount will increase by the percentage shown on the schedule of the original dollar benefit amounts on each anniversary of the option, up to the Maximum Multiple, so long as the option remains in force.
8. Compound Benefit Increase Rider – 4LTCIE0001-CBIO: Every dollar benefit amount will increase by the percentage(s) shown on the schedule of the current dollar benefit amounts on each anniversary of this option, up to the Maximum Multiple, so long as the option remains in force.
9. Delayed to Age 65 Compound Benefit Increase Rider – 4LTCIE0001-DBIO: After the Insured Person reaches attained age 65, every dollar benefit amount will increase by the percentage shown on the schedule of the current dollar benefit amounts on each anniversary of this option, up to the Maximum Multiple, so long as the option remains in force.
10. Guaranteed Purchase Option Rider – 4LTCIE0001-GPO: The Insured Person will have the opportunity to purchase additional coverage equal to 16% of the amounts initially elected on each of the Purchase Option Dates without evidence of insurability if:
- (1) the Insured Person has not reached the Attained Age Limit; and
 - (2) the policy is in force on the Purchase Option Date.
- Prior to age 70 this benefit will terminate if the Insured Person does not elect to purchase the additional amount on any two Purchase Option Dates.
11. Full Return of Premium Benefit Rider – 4LTCIE0001-FROP: Once all Insured Persons have died, the named beneficiary will receive the Full Return of Premium Benefit, which is an amount equal to the sum of all premiums paid.
12. Return of Premium Benefit Rider – 4LTCIE0001-ROP: Once all Insured Persons have died, the named beneficiary will receive the Return of Premium Benefit, which is an amount equal to the sum of all premiums paid less the amount of any benefits paid.
13. Graded Return of Premium Benefit Rider – 4LTCIE0001-GROP: Once all Insured Persons have died, the named beneficiary will receive the Graded Return of Premium Benefit, which is determined by the percentage chart shown on the Graded Return of Premium Benefit Rider form.
14. Non-forfeiture Benefit Shortened Benefit Period Rider – 4LTCIE0001-NFB: Once an Insured Person's coverage has been in effect for at least 3 full years, coverage will continue on a limited basis when it would otherwise have lapsed for nonpayment of premium with the following conditions:

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Description of Benefits

- (1) the daily benefit amounts available will remain as they were at the time coverage would have lapsed under the policy;
 - (2) the total benefit amount in force under this benefit will be equal to the amount of all premiums paid, excluding waived premiums, for all coverage combined including this benefit; and
 - (3) the minimum benefit provided will be equal to 30 times the daily benefit in force at the time the Policy would have lapsed.
15. Monthly Home Care Benefit Rider – 4LTCIE0001-MHC: If the Insured Person is receiving the Care Coordination Benefit, the actual charges incurred for Home Health Care and Adult Day Care will be paid on the basis of services received during each continuous 30-day period rather than on a daily basis. This benefit will be in lieu of the Home Health Care and Adult Day Care Benefit.
16. Enhanced Home Health Care Rider – 4LTCIE0001-EHHC
- Therapeutic Device Benefit – the actual charges incurred for the rental or purchase of a Therapeutic Device will be paid by the insurer if:
 1. the Insured Person is receiving the Personal Care Advisor Benefit; and
 2. the Therapeutic Device is used in the Insured Person's Home.
 - Home Modification Benefit – The actual charges incurred, not to exceed the Maximum Lifetime Home Modification Benefit, for labor, equipment and supplies needed in making minor modifications to the Insured Person's Home that will enhance his or her ability to perform the Activities of Daily Living and allow the Insured Person to safely remain in his or her home will be paid by the insurer if the Insured Person is receiving the Personal Care Advisor Benefit.
 - Medical Alert System Benefit The actual charges incurred for a Medical Alert System will be paid by the insurer for either: (1) rental and/or monitoring costs, not to exceed the monthly Medical Alert System Benefit; or (2) at the discretion of the insurer, the actual purchase cost of a Medical Alert System if the Insured Person is receiving the Personal Care Advisor Benefit.
17. Enhanced Nursing Home Care Rider – 4LTCIE0001-ENH
- Nursing Home Restoration of Benefits – Once a period of time during which the Insured Person has been confined to a Nursing Home and the insurer has been paying Nursing Home benefits under the policy has ended, the benefit amounts that have been paid will be restored to the remaining applicable Maximum Benefit if the Insured Person has ceased to meet the requirements for benefit eligibility for at least 180 consecutive days and the policy remains in force.
 - Lifetime Waiver of Premium – After the Insured Person has been continuously confined in a Nursing Home for 180 consecutive days, no future premium payments will be required.
 - Nursing Home Indemnity Payment Benefit – In lieu of the Nursing Home Benefit, the full amount of the Nursing Home Maximum Daily Benefit will be paid to the Insured Person.
18. Prescription Drug Benefit in a Nursing Home Rider – 4LTCIE0001-PDNH
An Insured Person will receive the Prescription Drug Benefit if they are receiving prescription drugs while confined to a Nursing Home and receiving the Nursing Home Benefit.

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Continental General Insurance Company

Description of Benefits

19. Full Restoration of Benefits Rider – 4LTCIE0001-FROB: Once a period of time during which the insurer has been paying benefits under the policy has ended, the benefit amounts that have been paid will be restored to the remaining applicable Maximum Benefit if the Insured Person has ceased to be a Chronically Ill Individual for at least 180 consecutive days and the policy remains inforce.

Continental General Insurance Company
Appendix C
Policy Forms: 4LTCIP0001, 4LTCIP0002
Distribution of Inforce Business as of 9/30/2019

Nationwide Excluding FL				
Issue Year	Count	% of Count	Premium	% of Premium
2005	2	0.0%	-	0.0%
2006	776	8.3%	1,288,132	8.4%
2007	3,534	37.8%	5,671,972	36.9%
2008	3,181	34.0%	5,606,112	36.5%
2009	1,772	18.9%	2,713,405	17.6%
2010	87	0.9%	100,275	0.7%
Total	9,352	100.0%	15,379,896	100.0%

Issue Age	Count	% of Count	Premium	% of Premium
<45	1,060	11.3%	605,438	3.9%
45 - 49	773	8.3%	747,311	4.9%
50 - 54	1,306	14.0%	1,618,223	10.5%
55 - 59	2,023	21.6%	3,277,855	21.3%
60 - 64	2,213	23.7%	4,159,660	27.0%
65 - 69	1,331	14.2%	3,100,269	20.2%
70 - 74	499	5.3%	1,349,296	8.8%
75 - 79	140	1.5%	494,803	3.2%
>80	7	0.1%	27,040	0.2%
Total	9,352	100.0%	15,379,896	100.0%

Attained Age	Count	% of Count	Premium	% of Premium
<45	302	3.2%	113,393	0.7%
45 - 49	211	2.3%	111,824	0.7%
50 - 54	374	4.0%	248,377	1.6%
55 - 59	614	6.6%	514,710	3.3%
60 - 64	1,130	12.1%	1,303,930	8.5%
65 - 69	1,738	18.6%	2,571,042	16.7%
70 - 74	2,202	23.5%	3,967,748	25.8%
75 - 79	1,755	18.8%	3,760,502	24.5%
>80	1,026	11.0%	2,788,371	18.1%
Total	9,352	100.0%	15,379,896	100.0%

Gender	Count	% of Count	Premium	% of Premium
Female	5,357	57.3%	9,183,308	59.7%
Male	3,995	42.7%	6,196,588	40.3%
Total	9,352	100.0%	15,379,896	100.0%

Inflation Options	Count	% of Count	Premium	% of Premium
5% Compound	1,104	11.8%	2,761,827	18.0%
5% Compound 2x	202	2.2%	356,351	2.3%
5% Compound 3x	55	0.6%	76,156	0.5%
5% Compound DE	5	0.1%	6,435	0.0%
5% Simple	4,000	42.8%	7,393,100	48.1%
GPO	301	3.2%	631,514	4.1%
None	3,685	39.4%	4,154,513	27.0%
Total	9,352	100.0%	15,379,896	100.0%

Limited Payment Options	Count	% of Count	Premium	% of Premium
5 Pay	20	0.2%	-	0.0%
10 Pay	82	0.9%	11,270	0.1%
15 Pay	12	0.1%	52,795	0.3%
20 Pay	24	0.3%	49,500	0.3%
PU at 65	15	0.2%	49,350	0.3%
Single	47	0.5%	-	0.0%
CNFO	1,107	11.8%	-	0.0%
Lifetime	8,045	86.0%	15,216,982	98.9%
Total	9,352	100.0%	15,379,896	100.0%

Elimination Period Days	Count	% of Count	Premium	% of Premium
0	140	1.5%	192,537	1.3%
30	635	6.8%	1,051,822	6.8%
60	1,445	15.5%	1,998,445	13.0%
90	1	0.0%	1,741	0.0%
100	6,738	72.0%	11,406,142	74.2%
180	372	4.0%	681,711	4.4%
365	21	0.2%	47,500	0.3%
Total	9,352	100.0%	15,379,896	100.0%

Benefit Period	Count	% of Count	Premium	% of Premium
< 1 year	1,100	11.8%	-	0.0%
1 - 2 years	143	1.5%	179,372	1.2%
2 - 3 years	694	7.4%	998,236	6.5%
3 - 4 years	2,178	23.3%	3,634,304	23.6%
4 - 5 years	1,211	12.9%	2,296,271	14.9%
5 - 6 years	2,155	23.0%	4,120,940	26.8%
6 - 7 years	223	2.4%	472,267	3.1%
7 - 8 years	65	0.7%	173,795	1.1%
8 - 9 years	132	1.4%	282,364	1.8%
Lifetime	1,451	15.5%	3,222,347	21.0%
Total	9,352	100.0%	15,379,896	100.0%

Pennsylvania				
Issue Year	Count	% of Count	Premium	% of Premium
2005	-	0.0%	-	0.0%
2006	-	0.0%	-	0.0%
2007	245	53.5%	510,077	51.8%
2008	136	29.7%	283,508	28.8%
2009	76	16.6%	188,839	19.2%
2010	1	0.2%	3,084	0.3%
Total	458	100.0%	985,509	100.0%

Issue Age	Count	% of Count	Premium	% of Premium
<45	7	1.5%	11,001	1.1%
45 - 49	16	3.5%	40,470	4.1%
50 - 54	36	7.9%	66,802	6.8%
55 - 59	123	26.9%	249,924	25.4%
60 - 64	162	35.4%	313,649	31.8%
65 - 69	71	15.5%	169,685	17.2%
70 - 74	30	6.6%	94,615	9.6%
75 - 79	13	2.8%	39,363	4.0%
>80	-	0.0%	-	0.0%
Total	458	100.0%	985,509	100.0%

Attained Age	Count	% of Count	Premium	% of Premium
<45	2	0.4%	1,059	0.1%
45 - 49	-	0.0%	-	0.0%
50 - 54	2	0.4%	2,383	0.2%
55 - 59	12	2.6%	33,712	3.4%
60 - 64	23	5.0%	39,500	4.0%
65 - 69	90	19.7%	187,225	19.0%
70 - 74	151	33.0%	300,012	30.4%
75 - 79	115	25.1%	240,750	24.4%
>80	63	13.8%	180,869	18.4%
Total	458	100.0%	985,509	100.0%

Gender	Count	% of Count	Premium	% of Premium
Female	282	61.6%	605,096	61.4%
Male	176	38.4%	380,412	38.6%
Total	458	100.0%	985,509	100.0%

Inflation Options	Count	% of Count	Premium	% of Premium
5% Compound	18	3.9%	73,860	7.5%
5% Compound 2x	2	0.4%	8,068	0.8%
5% Compound 3x	-	0.0%	-	0.0%
5% Compound DE	-	0.0%	-	0.0%
5% Simple	292	63.8%	768,026	77.9%
GPO	-	0.0%	-	0.0%
None	146	31.9%	135,555	13.8%
Total	458	100.0%	985,509	100.0%

Limited Payment Options	Count	% of Count	Premium	% of Premium
5 Pay	-	0.0%	-	0.0%
10 Pay	3	0.7%	-	0.0%
15 Pay	6	1.3%	26,006	2.6%
20 Pay	-	0.0%	-	0.0%
PU at 65	-	0.0%	-	0.0%
Single	2	0.4%	-	0.0%
CNFO	89	19.4%	-	0.0%
Lifetime	358	78.2%	959,503	97.4%
Total	458	100.0%	985,509	100.0%

Elimination Period Days	Count	% of Count	Premium	% of Premium
0	14	3.1%	29,525	3.0%
30	61	13.3%	129,422	13.1%
60	80	17.5%	168,380	17.1%
90	-	0.0%	-	0.0%
100	281	61.4%	597,591	60.6%
180	22	4.8%	60,592	6.1%
365	-	0.0%	-	0.0%
Total	458	100.0%	985,509	100.0%

Benefit Period	Count	% of Count	Premium	% of Premium
< 1 year	89	19.4%	-	0.0%
1 - 2 years	3	0.7%	5,054	0.5%
2 - 3 years	30	6.6%	56,679	5.8%
3 - 4 years	137	29.9%	346,790	35.2%
4 - 5 years	81	17.7%	202,817	20.6%
5 - 6 years	67	14.6%	193,825	19.7%
6 - 7 years	20	4.4%	54,762	5.6%
7 - 8 years	-	0.0%	-	0.0%
8 - 9 years	2	0.4%	11,248	1.1%
Lifetime	29	6.3%	114,334	11.6%
Total	458	100.0%	985,509	100.0%

Continental General Insurance Company
Appendix C
Policy Forms: 4LTCP0001, 4LTCP0002
Distribution of Inforce Business as of 9/30/2019

Nationwide Excluding FL

Marital Status	Count	% of Count	Premium	% of Premium
Single	1,573	16.8%	2,994,914	19.5%
Married	7,779	83.2%	12,384,982	80.5%
Total	9,352	100.0%	15,379,896	100.0%

HHC Percent	Count	% of Count	Premium	% of Premium
0.5-0.75	463	5.0%	855,497	5.6%
0.75-1	309	3.3%	597,189	3.9%
1-1.25	7,017	75.0%	11,338,375	73.7%
1.25-1.5	723	7.7%	1,139,321	7.4%
>1.5	840	9.0%	1,449,514	9.4%
Total	9,352	100.0%	15,379,896	100.0%

Tax Status	Count	% of Count	Premium	% of Premium
NTQ	-	0.0%	-	0.0%
TQ	9,352	100.0%	15,379,896	100.0%
Total	9,352	100.0%	15,379,896	100.0%

Premium-Paying Status	Count	% of Count	Premium	% of Premium
Not Paid Up	8,092	86.5%	15,379,896	100.0%
Paid Up	1,260	13.5%	-	0.0%
Total	9,352	100.0%	15,379,896	100.0%

Premium Mode	Count	% of Count	Premium	% of Premium
Annual	2,391	29.5%	5,354,115	34.8%
Monthly	4,806	59.4%	8,204,635	53.3%
Quarterly	737	9.1%	1,421,066	9.2%
Semi-Annual	158	2.0%	400,079	2.6%
Total	8,092	100.0%	15,379,896	100.0%

*Count includes premium paying lives only

Underwriting Class	Count	% of Count	Premium	% of Premium
Preferred	796	8.5%	1,346,365	8.8%
Spouse NA Standard	790	8.4%	1,740,373	11.3%
Spouse NA Preferred	788	8.4%	1,435,334	9.3%
Spouse NA Smoker	36	0.4%	85,746	0.6%
Spouse Preferred	3,690	39.5%	5,162,601	33.6%
Spouse Standard	2,408	25.7%	3,797,631	24.7%
Standard	715	7.6%	1,513,872	9.8%
Substandard	45	0.5%	126,110	0.8%
Substandard Smoker	2	0.0%	4,786	0.0%
Spouse Smoker	82	0.9%	167,078	1.1%
Total	9,352	100.0%	15,379,896	100.0%

Pennsylvania

Marital Status	Count	% of Count	Premium	% of Premium
Single	92	20.1%	213,790	21.7%
Married	366	79.9%	771,719	78.3%
Total	458	100.0%	985,509	100.0%

HHC Percent	Count	% of Count	Premium	% of Premium
0.5-0.75	9	2.0%	18,051	1.8%
0.75-1	6	1.3%	9,807	1.0%
1-1.25	420	91.7%	903,130	91.6%
1.25-1.5	12	2.6%	26,256	2.7%
>1.5	11	2.4%	28,265	2.9%
Total	458	100.0%	985,509	100.0%

Tax Status	Count	% of Count	Premium	% of Premium
NTQ	-	0.0%	-	0.0%
TQ	458	100.0%	985,509	100.0%
Total	458	100.0%	985,509	100.0%

Premium-Paying Status	Count	% of Count	Premium	% of Premium
Not Paid Up	364	79.5%	985,509	100.0%
Paid Up	94	20.5%	-	0.0%
Total	458	100.0%	985,509	100.0%

Premium Mode	Count	% of Count	Premium	% of Premium
Annual	193	53.0%	555,042	56.3%
Monthly	76	20.9%	180,626	18.3%
Quarterly	78	21.4%	198,098	20.1%
Semi-Annual	17	4.7%	51,743	5.3%
Total	364	100.0%	985,509	100.0%

*Count includes premium paying lives only

Underwriting Class	Count	% of Count	Premium	% of Premium
Preferred	49	10.7%	103,312	10.5%
Spouse NA Standard	61	13.3%	151,618	15.4%
Spouse NA Preferred	29	6.3%	76,218	7.7%
Spouse NA Smoker	1	0.2%	6,415	0.7%
Spouse Preferred	142	31.0%	274,337	27.8%
Spouse Standard	130	28.4%	254,949	25.9%
Standard	40	8.7%	98,347	10.0%
Substandard	3	0.7%	12,130	1.2%
Substandard Smoker	-	0.0%	-	0.0%
Spouse Smoker	3	0.7%	8,182	0.8%
Total	458	100.0%	985,509	100.0%

Continental General Insurance Company
Appendix D
Actuarial Assumption Development

Appendix D contains a description of the experience studies conducted on the Company's actual experience.

Termination Study

A study was conducted on the Company's actual termination experience from 2006 to 6/30/2018 on forms issued by Continental General Insurance Company. The study measured total termination rates.

The future expected voluntary lapse assumptions were developed based on the historical implied lapse experience and judgment. Historical implied lapses were determined by subtracting expected deaths and actual benefit exhaustions from total terminations. The expected voluntary lapse rates vary by inflation option, spousal discount, gender, and policy duration. Expected deaths were calculated assuming mortality is equal to 100% of the Individual Annuity Mortality (IAM) 2012 Basic table with mortality steepening factors, mortality improvement, and selection factors applied. This mortality assumption, including selection factors and mortality improvement, is based on industry expectations.

Exhibit D-1 contains the comparison of implied lapse experience to the current lapse assumptions. The Exhibit shows total lives, actual total terminations and expected deaths. The voluntary lapse rates are shown as described above, as historical implied lapses and expected lapses.

Morbidity Study

A morbidity study was also conducted on the Company's actual experience from 2006 to 6/30/2018 on forms issued by Continental General Insurance Company. Actual claims were measured against the Milliman 2017 Long Term Care Guidelines (Guidelines). Actual-to-expected fitting factors were developed based on the actual experience and judgment.

Actual incurred claims are based on paid claims and remaining claim reserves discounted (using an interest rate of 4.5% for this experience study) back to the claim incurred date. The claim reserves were discounted from valuation date to the claim incurred date using a 4.5% discount rate and excluding any waiver of premium load, LAE load and explicit margin. Actual claims include approximately \$22 million of Incurred But Not Reported reserve (IBNR) as of June 30, 2018, which is allocated to incurred year as follows: approximately 84.5% to incurred year 2018 and 15.5% to incurred year 2017. Actual incurred claims are calculated by adding together the present value of paid claims and claim reserves. Actual average claim severity was calculated by dividing actual incurred claims by the count of claims. In this study, waiver of premium was excluded from both the actual claims and expected claims.

Expected claims were based on the *Guidelines* and include selection factors and actual-to-expected fitting factors. The actual-to-expected fitting factors varied by coverage type, benefit period, payment type, marital status, and form. No future morbidity improvement is assumed.

Exhibit D-2 contains the comparison of actual claim experience to the current assumptions for the policy forms included in this filing.

Continental General Insurance Company
Appendix D
Exhibit D-1
Termination Study

Experience by Policy Duration

Policy Duration	Total Lives	Total Terminations Count	Rate	Mortality Rate Expected	Voluntary Lapse Rate Implied	"Current"
1	17,268	1,862	10.8%	0.2%	10.6%	10.8%
2	19,223	1,080	5.6%	0.3%	5.3%	5.4%
3	19,485	836	4.3%	0.3%	3.9%	4.1%
4	19,935	745	3.7%	0.4%	3.3%	3.3%
5	20,641	591	2.9%	0.4%	2.4%	2.6%
6	21,425	556	2.6%	0.5%	2.1%	2.1%
7	21,795	496	2.3%	0.5%	1.7%	1.9%
8	21,174	411	1.9%	0.6%	1.3%	1.5%
9	19,655	386	2.0%	0.7%	1.2%	1.4%
10	17,017	393	2.3%	0.7%	1.5%	1.0%
11	12,513	250	2.0%	0.9%	1.1%	0.9%
12	9,213	182	2.0%	1.0%	0.9%	0.8%
13	6,437	141	2.2%	1.2%	0.9%	0.7%
14	4,406	118	2.7%	1.5%	1.1%	0.6%
15+	7,244	257	3.5%	2.0%	1.3%	0.5%
Total	237,432	8,304	3.5%	0.6%	2.87%	2.87%

Notes:

- 1) Experience from 2006 through 6/30/2018.
- 2) Expected Mortality Rate is 100% of the Individual Annuity Mortality (IAM) 2012 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors.
- 3) Implied Voluntary Lapse Rate is the Total Termination Rate minus the Expected Mortality Rate minus the Actual Benefit Exhaust Rate.
- 4) Current Voluntary Lapse Rate is the current projection assumption.
 Since these vary by inflation benefit option, spousal discount, and gender the rates shown above are composites.
 The ultimate lapse rate begins in duration 15.
- 5) Includes only lifetime pay policies (excludes single Pay, 5 Pay, 10 Pay, 15 Pay, 20 Pay, and paid-up at 65).

Continental General Insurance Company

Appendix D

Exhibit D-2

**Policy Forms: 1LTCGP0001, 1LTCGP0008, 1LTCIP0001, 1LTCIP0002, 2LTCIP0001, 2LTCIP0002, 4LTCIP0001
Claim Study**

Experience by Policy Duration

Policy Duration	Total Lives	Actual Claim Count	Actual Incurred Claims	Expected Incurred Claims	Actual to Expected
1	21,621	9	758,605	557,833	136.0%
2	22,556	31	1,453,873	1,214,373	119.7%
3	21,995	25	1,885,218	1,720,445	109.6%
4	22,443	25	1,176,810	2,506,853	46.9%
5	22,938	48	3,578,850	3,510,572	101.9%
6	23,353	68	5,796,078	4,714,104	123.0%
7	23,098	65	5,288,287	5,976,829	88.5%
8	22,601	107	7,487,865	7,334,949	102.1%
9	21,914	105	7,933,784	8,804,755	90.1%
10	19,668	108	9,315,687	9,809,126	95.0%
11	15,938	128	8,623,840	9,555,444	90.3%
12	11,691	100	8,377,240	8,770,658	95.5%
13	8,518	81	6,993,553	7,740,239	90.4%
14	5,527	75	4,668,981	6,434,048	72.6%
15+	9,507	194	20,448,906	16,155,953	126.6%
Total	273,368	1,171	93,787,578	94,806,182	98.9%

Experience by Calendar Year

Calendar Year	Total Lives	Actual Claim Count	Actual Incurred Claims	Expected Incurred Claims	Actual to Expected
2006	13,602	23	1,208,168	1,565,355	77.2%
2007	18,091	39	2,152,494	2,173,376	99.0%
2008	23,319	39	2,125,616	2,961,136	71.8%
2009	26,259	50	3,763,974	3,863,635	97.4%
2010	26,642	58	4,967,618	4,824,553	103.0%
2011	23,933	82	5,777,331	5,877,098	98.3%
2012	23,219	101	6,900,358	7,100,818	97.2%
2013	22,629	105	7,465,161	8,397,998	88.9%
2014	22,090	108	9,378,267	10,026,923	93.5%
2015	21,603	143	11,570,237	11,546,603	100.2%
2016	21,144	149	12,138,393	13,248,071	91.6%
2017	20,701	175	15,786,771	14,986,944	105.3%
2018	10,137	99	10,553,188	8,233,672	128.2%
Total	273,368	1,171	93,787,578	94,806,182	98.9%

Experience by Policy Form

Policy Form	Total Lives	Actual Claim Count	Actual Incurred Claims	Expected Incurred Claims	Actual to Expected
1LTCG	7,633	11	1,087,514	1,453,414	74.8%
1LTCI	50,876	550	44,069,338	45,343,925	97.2%
2LTCI	98,651	340	27,395,445	26,666,073	102.7%
4LTCI	116,209	271	21,235,281	21,342,770	99.5%
Total	273,368	1,171	93,787,578	94,806,182	98.9%

Notes:

1) Experience from 2006 through 6/30/2018

2) Actual incurred claims are defined as the sum of paid claims and reserves.

Paid claims represent the present value of paid claims discounted to the claim incurred date.

Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.

3) Expected Claims are based on the Milliman 2017 *Long-Term Care Guidelines* (including Product Factors)

4) Claim dollar amounts are discounted using a 4.50% interest rate (both actual and expected).

5) 1LTCG refers to 1LTCGP0001 and 1LTCGP0008, 1LTCI refers to 1LTCIP0001 and 1LTCIP0002,

2LTCI refers to 2LTCIP0001 and 2LTCIP0002, 4LTCI refers to 4LTCIP0001 and 4LTCIP0002

Continental General Insurance Company
Appendix E
Policy Forms: 4LTCIP0001
Policy Persistency Comparison

Policy Duration	<u>Actual Experience</u>		<u>Original Pricing Assumptions</u>			<u>Current Assumptions</u>			
	Total Lives	Total Terminations	Lapse	Mortality	Total Terminations	Lapse	Mortality	Benefit Exhaustion	Total Terminations
1	13,633	11.4%	5.1%	0.2%	5.3%	10.7%	0.2%	0.0%	10.8%
2	12,085	5.9%	3.6%	0.4%	4.0%	5.3%	0.3%	0.0%	5.6%
3	11,367	4.6%	3.0%	0.5%	3.5%	4.1%	0.4%	0.0%	4.4%
4	10,843	3.6%	2.0%	0.7%	2.7%	3.3%	0.4%	0.0%	3.7%
5	10,451	2.9%	1.5%	0.8%	2.3%	2.6%	0.4%	0.0%	3.0%
6	10,153	2.4%	1.2%	1.0%	2.2%	2.1%	0.5%	0.0%	2.5%
7	9,868	2.5%	1.2%	1.1%	2.3%	1.9%	0.5%	0.1%	2.5%
8	9,501	1.7%	1.2%	1.2%	2.5%	1.5%	0.5%	0.0%	2.0%
9	8,323	1.6%	1.2%	1.4%	2.6%	1.3%	0.6%	0.0%	2.0%
10	6,193	2.8%	1.2%	1.5%	2.7%	1.0%	0.7%	0.1%	1.7%
11	2,202	2.1%	1.2%	1.8%	3.0%	0.8%	0.8%	0.0%	1.6%
12	104	1.9%	1.3%	2.1%	3.3%	0.8%	1.0%	0.0%	1.7%

Notes:

- 1) Experience is 2006 through 6/30/18.
- 2) The "Original Pricing Assumptions" are those provided in the original pricing Actuarial Memorandum.
- 3) Since Lapse Rates vary by inflation benefit option, spousal discount, and gender, the rates shown above are composites.
The ultimate lapse rate starts in duration 15.
- 4) The mortality assumptions are 100% of the Individual Annuity Mortality (IAM) 2012 Basic Table with mortality steepening factors applied, historical mortality improvement, and selection factors.
- 5) Benefit exhaustion rates are based on actual experience.
- 6) The results shown above include only lifetime pay policies (excludes single pay, 5 pay, 10 pay, 15 pay, 20 pay, and paid-up at 65).

Continental General Insurance Company

P.O. Box 203098

Austin, TX 78720-3098

[TEMPLATE ID]

[Name]

[Today's Date]

[Address Line 1]

[Address Line 2]

[Address Line 3]

[City, State, Zip Code]

RE: Policy/Certificate No. [XXXXXXX]

Dear Policy/Certificate Holder:

Continental General Insurance Company[,the administrator for Great American Life Insurance Company's long term care insurance business,] makes every effort to provide quality long term care insurance coverage at reasonable and affordable premium rates. However, the total claims experience for this policy form is in excess of expected levels.

Accordingly, it has become necessary for the Company to increase those premium rates. This adjustment is not related to your personal claims experience, but rather the claims experience for all policies/certificates on this policy form. This adjustment is effective on your premium due date of [Rate Increase Effective Date].

Premium Adjustment		
Current [Modal] Premium [\$X,XXX.XX]	New [Modal] Premium [\$X,XXX.XX]	Rate Increase Percentage [XX]%

[In addition to the current rate increase, the Company will be implementing a [XX]% rate increase approximately one year after the current increase.] Also, the Company anticipates the need to request [an] additional rate increase[s] in the future. This is the Company's current best estimate for future rate increase action on this policy form. However, this plan could change if future claims experience varies from current expectations.

We have enclosed some information for you in the form of Frequently Asked Questions. We recommend that you review this material, which we believe will address many of your questions and concerns about certain coverage considerations.

[The benefits available to you in your policy/certificate offer valuable insurance protection. Enclosed you will find benefit reduction options and information regarding a Contingent Nonforfeiture Benefit that is being offered to you at this time. If you are interested in discussing these options or have questions, please contact our Client Services Department toll-free at [866-830-0607].]

[The benefits available to you in your policy/certificate offer valuable insurance protection. If you are interested in discussing benefit reduction options to reduce your premium, please call our Client Services Department toll-free at [866-830-0607]. Should you decide not to keep your policy/certificate in force at the increased premium level, or at a reduced benefit level, the Company is offering a Contingent Nonforfeiture Benefit at this time. This benefit is described in the enclosed Contingent Nonforfeiture Benefit Option page.]

Administration for:

Great American Life Insurance Company®

Loyal American Life Insurance Company®

P.O. Box 203098 • Austin, TX 78720-3098

Toll Free: (866) 830-0607 • Fax: (888) 769-0737

Continental General Insurance Company

P.O. Box 203098

Austin, TX 78720-3098

Sincerely,

[W. Travis Simpson]

[Senior Vice President and Chief Operating Officer]

Administration for:

Great American Life Insurance Company®

Loyal American Life Insurance Company®

P.O. Box 203098 • Austin, TX 78720-3098

Toll Free: (866) 830-0607 • Fax: (888) 769-0737

FREQUENTLY ASKED QUESTIONS

Additional Premium Increases

My premiums are being increased. Where is that allowed by my policy/certificate?

The Company has the right to adjust premiums in accordance with the terms of the policy/certificate. The face page of your policy/certificate discusses how this must be done. The premium increase has been filed with the Department of Insurance in the state where your policy/group master policy was issued.

You have told me that you are going to increase my premiums. Can I expect additional increases in the future?

As mentioned in the cover letter, the Company anticipates the need to pursue [an] additional rate increase[s] in the future. [In addition to the current rate increase, the Company will be implementing [a/an] [XX]% rate increase approximately one year after the current increase.] This is the Company's current best estimate for future rate increase action on this policy form, but this plan could change if future claims experience varies from current expectations. As with this increase, any future increases would continue to be based on the overall experience of your class of insureds and filed with your state insurance department for approval, if required. You will be notified in advance of such increases as stated in your policy/certificate. We believe this information will enable you to anticipate the likelihood of future premium increases and to make an informed decision as to any benefit change options that could lower your premium now.

Benefit Reduction Options

I understand that my premiums are being increased. I am not sure I want to pay the increased premium. Do I have any options?

We may be able to provide you with alternative approaches to offset the increase by modifying the benefits in your policy/certificate. Our Client Services Department can give you detailed information about your policy/certificate. Some considerations might include removing optional riders that you may have purchased. However, you should always consider that if you reduce your coverage, you run the risk of increasing your out of pocket costs at the time of claim.

If I choose to reduce my premiums, how long do I have to pick an option?

Your premium will increase on the effective date stated in your notice letter, but you may change your coverage at any time. You may elect now, or any time in the future, to reduce benefits as outlined above. If you select any of the attached benefit reduction options, they will become effective on the rate increase effective date of [Rate Increase Effective Date], unless you specify otherwise.

Can the Company delay making my premium increase effective until I decide which option is best for me?

All policy/certificate holders within the same premium class must be treated similarly. We make sure that notices are mailed in advance of the increase to allow you time to make a decision. We cannot delay the premium increase on an individual policy/certificate basis.

Survivorship Considerations

If I have a Survivorship Benefit in my policy/certificate, how is this affected by the premium adjustment?

The survivorship benefit can be a very valuable feature. The benefit is not directly impacted by the premium adjustment. However, if you elect the Contingent Nonforfeiture Benefit as outlined below,

your policy/certificate will be converted to a paid-up status, and the survivorship benefit will no longer be necessary.

NOTE: Please refer to your specific policy/certificate language for information relating to how your survivorship option may work and any qualifications that may apply.

Contingent Nonforfeiture Benefit

If I choose not to pay future premiums, what happens to my coverage?

If you do not pay your premium when it becomes due, your current coverage will lapse, i.e. terminate. However, in order to help you avoid losing the amount of the premiums you have paid up to this point for your coverage, the Company will provide you with a Contingent Nonforfeiture Benefit. [This benefit will allow your daily benefit amount and elimination period to remain the same, but the maximum benefits available will be reduced. The new maximum benefit will be determined as indicated on the enclosed Contingent Nonforfeiture Benefit Option page. Any inflation protection under your policy/certificate will stop at this time. This is not a cash value. It is benefit dollars available to you in the event that you become eligible for and receive covered services in the future. Once your Contingent Nonforfeiture Benefit has been exercised, you may not resume the payment of premiums or make any changes to your policy/certificate.]

You can elect the Contingent Nonforfeiture Benefit by completing and returning the attached Contingent Nonforfeiture Benefit Option form now or within 120 days following the due date of the rate increase. This benefit is automatic if you stop paying your premiums now or within 120 days after the effective date of the rate increase.]

[Contingent Nonforfeiture Benefit Option 1:

This benefit will allow your daily benefit amount and elimination period to remain the same, but the maximum benefits available will be reduced. The new maximum benefit will be determined as indicated on the enclosed Contingent Nonforfeiture Benefit Option page. Any inflation protection under your policy/certificate will stop at this time.

Contingent Nonforfeiture Benefit Option 2:

This benefit will allow your elimination period and remaining lifetime benefit amount to remain the same, but the daily benefit amounts will be reduced. The new daily benefit amounts will be determined as indicated on the enclosed Contingent Nonforfeiture Benefit Option page. Any inflation protection under your policy/certificate will stop at this time.

The Contingent Nonforfeiture Benefit is not a cash value. It is benefit dollars available to you in the event that you become eligible for and receive covered services in the future. Once your Contingent Nonforfeiture Benefit has been exercised, you may not resume the payment of premiums or make any changes to your policy/certificate.

You can elect the Contingent Nonforfeiture Benefit by completing and returning the attached Contingent Nonforfeiture Benefit Option form now or within 120 days following the due date of the rate increase. The Contingent Nonforfeiture Benefit Option 2 is automatic if you stop paying your premiums now or within 120 days after the effective date of the rate increase.]

NOTE: The Contingent Nonforfeiture Benefit provides limited benefits and is not a cash value. We urge you to carefully consider whether or not such limited benefits are appropriate for you.

Other Questions

My premiums are taken directly from my bank account. Do I need a new Pre-Authorized Checking form?

No, your existing authorization will allow us to deduct the correct premium from your account.

I am currently receiving benefits under my policy/certificate. How does this impact me if my premiums are being waived?

The premium increase will not impact your current claim. Your policy/certificate will continue to provide you with benefits in accordance with the terms of the coverage you purchased. The policy/certificate benefit that waives premium will continue to work the same way. If your premiums are currently being waived, the new premium will also be waived until such time as you are no longer eligible for waiver of premium, as stated in your policy/certificate. You will begin to pay the adjusted premium when you return to a premium paying status.

I have read the enclosed documents and I still have questions. How do I get these questions answered?

If you would like assistance or have additional questions, please contact our Client Services Department toll-free at [866-830-0607].

[BENEFIT REDUCTION OPTIONS TO REDUCE YOUR PREMIUM

If you wish to modify your coverage as outlined in the options listed on the reverse side of this page, please declare the requested option in the space provided, sign and date in the space provided, and return this letter to Continental General Insurance Company[,the administrator for Great American Life Insurance Company's long term care insurance business,] in the enclosed postage paid return envelope. If you are interested in discussing your options for coverage changes in more detail, please call our Client Services Department toll-free at [866-830-0607].

Please note that this is only a QUOTE, NOT A GUARANTEE of any rate quoted, or a revision to your current policy/certificate. Premium calculations are based on the information provided and policy/certificate coverage as of [Today's Date]. Actual premium may differ slightly. As a result, please do not remit premium with any benefit reductions. Upon election, your policy/certificate will be endorsed to reflect the actual premium.

Please be aware that modifying your coverage may impact other benefits provided by your policy/certificate. Please refer to your policy/certificate for information regarding your coverage. If you have additional questions, please contact our Client Services Department.

Changes to your coverage may not be in your best interest if you are on claim or eligible to be on claim.

Changes to your coverage may not be in your best interest if you have a Premium Payment Amendatory Rider attached to your policy/certificate. Once your policy is paid-up based on the Premium Payment Amendatory Rider, your policy/certificate will automatically be renewed for the rest of your lifetime with no further premium payments required.

Should you decide not to keep your policy/certificate in force at the increased premium level, or at a reduced benefit level, the Company is offering a Contingent Nonforfeiture Benefit at this time. This benefit is described in the enclosed Contingent Nonforfeiture Benefit Option page.

Effective on your premium due date of [Rate Increase Effective Date], the [Modal] premium for your long term care insurance will be increased to [\$X,XXX.XX]. Please select the requested benefit reduction option, which will become effective on the rate increase effective date. [You are entitled to select more than one of the following options.] Sign and date in the space provided and return this page to Continental General Insurance Company[,the administrator for Great American Life Insurance Company’s long term care insurance business,] in the enclosed postage paid return envelope.

☐ **[Benefit Reduction Option 1 – Downgrade Maximum Lifetime Benefit**

Original Maximum Lifetime Benefit	[\$XXX,XXX]
Reduced Maximum Lifetime Benefit	[\$XXX,XXX]
Premium After Reducing Benefit	[\$X,XXX.XX]

☐ **[Benefit Reduction Option [2] – Downgrade Maximum Daily Benefit**

Original Long Term Care Daily Benefit	[\$XXX.XX]
Reduced Long Term Care Daily Benefit	[\$XXX.XX]
[Original Assisted Living Facility Daily Benefit	[\$XXX.XX]
Reduced Assisted Living Facility Daily Benefit	[\$XXX.XX]
[Original Home Health/Home and Community Care Daily Benefit	[\$XXX.XX]
Reduced Home Health/Home and Community Care Daily Benefit	[\$XXX.XX]
Premium After Reducing Benefit	[\$X,XXX.XX]

☐ **[Benefit Reduction Option [3] – Increase Elimination Period**

Current Elimination Period	[XX Days]
Increased Elimination Period	[XX Days]
Premium After Increasing Elimination Period	[\$X,XXX.XX]

By signing below, I am authorizing [Great American Life Insurance Company/Continental General Insurance Company] to reduce my coverage as indicated by the Option(s) selected/checked above.

Signature of Insured: _____	Date: _____
Policy/Certificate No. _____	Policy/Certificate Holder Name: [Policy/Certificate Holder
[Policy/Certificate Number]	Name]]

CONTINGENT NONFORFEITURE BENEFIT OPTION

Regardless of any Contingent Nonforfeiture riders attached to your policy/certificate, the Company will provide you with a Contingent Nonforfeiture Benefit if you choose to lapse your policy/certificate now or within 120 days after the effective date of the rate increase. You may elect to exercise this benefit by returning this completed form. However, if we do not hear from you and your policy/certificate lapses within this time period, the Contingent Nonforfeiture Benefit [Option 2] will automatically take effect.

This rate increase will be effective on your premium due date of [Rate Increase Effective Date]. This offer expires [Rate Increase Effective Date + 120 Days].

[The Contingent Nonforfeiture Benefit will convert your policy/certificate to a paid-up status which will shorten the benefit period provided by your policy/certificate but will maintain your maximum daily benefit and elimination period at the time of conversion. If you have inflation protection under your policy/certificate, no further increases will occur. Your maximum benefit amount will be equal to the greater of the sum of all premiums paid for the policy/certificate and any attached riders or thirty (30) times the maximum daily long term care benefit at the time of conversion. The maximum benefit amount provided by this Contingent Nonforfeiture Benefit shall not exceed the remaining unused Maximum Lifetime Benefit of your current policy/certificate at the time of conversion. This is not a cash value option.

NOTE: This Contingent Nonforfeiture Benefit will automatically be provided to you if you lapse your policy/certificate now or within 120 days after the effective date of this rate increase.]

☐ CONTINGENT NONFORFEITURE OPTION 1

This Contingent Nonforfeiture Benefit will convert your policy/certificate to a paid-up status which will shorten the benefit period provided by your policy/certificate but will maintain your maximum daily benefit and elimination period at the time of conversion. If you have inflation protection under your policy/certificate, no further increases will occur. Your maximum benefit amount will be equal to the greater of the sum of all premiums paid for the policy/certificate and any attached riders or thirty (30) times the maximum daily long term care benefit at the time of conversion. The maximum benefit amount provided by this Contingent Nonforfeiture Benefit shall not exceed the remaining unused Maximum Lifetime benefit of your current policy/certificate at the time of conversion. This is not a cash value option.

☐ CONTINGENT NONFORFEITURE OPTION 2

This Contingent Nonforfeiture Benefit will convert your policy/certificate to a paid-up status which will lower your daily benefits but will maintain your elimination period and remaining lifetime benefit amount at the time of conversion. If you have inflation protection under your policy/certificate, no further increases will occur. Your daily benefit amounts will be equal to 90% of your current daily benefits times the ratio of the number of completed months of paid premiums divided by the number of month in the premium paying period for your policy/certificate. This is not a cash value option.

NOTE: The Contingent Nonforfeiture Benefit Option 2 will automatically be provided to you if you lapse your policy/certificate now or within 120 days after the effective date of this rate increase.]

By signing below, I am electing the Contingent Nonforfeiture Benefit and am authorizing [Great American Life Insurance Company/Continental General Insurance Company] to convert my policy/certificate to a paid-up status with no further premiums due.

DO NOT complete and return this form if you are electing a Benefit Reduction Option or are maintaining your current policy/certificate and benefits by paying the new premium.

Signature of Insured: _____		Date: _____
Policy/Certificate No.	Policy/Certificate Holder Name: [Policy/Certificate	
[Policy/Certificate Number]	Holder Name]	

Managing and Monitoring Long Term Care Risks

Risk Management processes and staffing are focused on four specific stages of the managing the claims process: Intake/New Claim Setup, Adjudication, Ongoing Management/Payment, and Claim Resolution.

Intake/New Claim Setup: By keeping the eligibility requirements-gathering process agile, significant delays are avoided that could otherwise compromise our ability to make sound claim decisions and prevent us from complying with our regulatory requirements. We maintain a team dedicated to following up on claim notices received via telephone or electronically. This unit can accurately assess the developing circumstances that surround an early claim and guide the claimant and family through a timely and effective adjudication process while setting appropriate expectations by reviewing each insured's policy benefit information and coverage. Our proactive front-end process helps avoid "buying" claims that would otherwise happen if we just mailed a claim form.

Adjudication: As eligibility requirements are received, our extensive front-end Intake process proceeds to Adjudication. New claims are presented by the Claims Examiner to either a senior second-tier review specialist or to our Claim Committee, along with recommendations for approval, denial or further handling and disposition. The committee meets on a regular basis and consists of senior level staff with many years of experience, as well as management personnel who can discuss the claim and confirm the claim determination or offer any special guidance for handling.

It is vital that we thoroughly understand the medical circumstances that drive eligibility for each claim and that will set the stage for its development and outcome.

Ongoing Management/Payment: One of the most important risk controls for LTC claims is the active monitoring and payment of an approved, ongoing claim. Claimants that have a potential for recovery are closely monitored to ensure that the eligibility criteria continues to be met.

The protocol for reviewing ongoing claims is set by each individual claimant's medical status and recovery potential. In addition to our internal RN staff, also available to us are the services of an expert LTC Medical Director who can consult on the most difficult cases and who may also be called upon to clarify information given to us by the insured's own attending physician.

Ongoing claims are examined carefully for changes in billing patterns, changes in levels of care and breaks of confinement for possible hospital stays or other leaves. Confinement verification protocol ensures that claim payments are properly adjusted to reflect these leaves.

Claim Resolution: Controlling the trajectory of short duration claims can have a positive outcome for early claim closure and restoration of premium payment. This is often a "win-win" situation for both the company and the client.

Also, accurate and timely resolution of a client's death and accurately paying a claim to its coverage maximums prevents overpayment, recovery costs and disruption to a grieving family.

Also critical to managing risk exposure and monitoring morbidity are fraud detection controls, ongoing claims audits, and periodic updates to our expected claim costs.

Fraud: Our LTC processes include several fraud detection and mitigation controls and practices. Staff members are trained annually on several aspects of fraud including "red flags" of LTC fraud detection and will refer suspect claim activity to management for review and further action if warranted. If necessary, independent medical exams or other investigatory methods may be used to resolve outstanding concerns. All suspect claim activity is reported to the appropriate state governing agencies as required. Lastly, our Strategic Investigative Unit (SIU) is comprised of a multidisciplinary group of senior leaders who serve as a sounding board and steering committee for both specific and general fraud matters.

Claims Audits: In addition to an ongoing robust internal claims audit program, we also engage external 3rd party audit reviews, assuring that our claims processes and practices are sound and generally in line with industry practices and regulatory controls. The most recent external review occurred in 2018 and covered a sample of claims with losses occurring between 2012 and 2018.

Internal audits represent a constant feedback loop. Results are reviewed monthly with senior management staff for discussion, process improvement and training purposes.

Exhibit 1
Continental General Insurance
Summary of Premium Paying Lives
Nationwide
Policy Forms: 4LTCIP0001, 4LTCIP0002
As of 9/30/2019

State	Lives	Annualized Premium	Average Premium
AK	16	\$ 64,279	\$ 4,017
AL	615	\$ 1,169,946	\$ 1,902
AR	173	\$ 153,747	\$ 889
AZ	56	\$ 102,329	\$ 1,827
CO	63	\$ 95,575	\$ 1,517
DE	-	\$ -	\$ -
GA	383	\$ 379,359	\$ 990
IA	445	\$ 841,955	\$ 1,892
ID	6	\$ 13,394	\$ 2,232
IL	349	\$ 869,401	\$ 2,491
IN	271	\$ 500,093	\$ 1,845
KS	185	\$ 253,811	\$ 1,372
KY	251	\$ 383,628	\$ 1,528
LA	372	\$ 409,300	\$ 1,100
MA	29	\$ 55,368	\$ 1,909
MD	39	\$ 100,117	\$ 2,567
ME	21	\$ 33,238	\$ 1,583
MI	29	\$ 96,261	\$ 3,319
MN	793	\$ 1,442,484	\$ 1,819
MO	499	\$ 560,440	\$ 1,123
MS	418	\$ 628,414	\$ 1,503
MT	6	\$ 16,155	\$ 2,693
NC	1,005	\$ 2,858,330	\$ 2,844
ND	69	\$ 92,427	\$ 1,340
NE	84	\$ 184,224	\$ 2,193
NH	25	\$ 37,490	\$ 1,500
NM	18	\$ 20,962	\$ 1,165
NV	13	\$ 28,450	\$ 2,188
OH	152	\$ 452,369	\$ 2,976
OK	185	\$ 238,034	\$ 1,287
OR	37	\$ 87,051	\$ 2,353
PA	364	\$ 985,509	\$ 2,707
RI	4	\$ 9,558	\$ 2,389
SC	90	\$ 186,869	\$ 2,076
SD	97	\$ 238,903	\$ 2,463
TN	146	\$ 279,018	\$ 1,911
TX	427	\$ 727,369	\$ 1,703
UT	49	\$ 91,549	\$ 1,868
VA	144	\$ 259,794	\$ 1,804
VT	1	\$ 1,467	\$ 1,467
WA	44	\$ 131,617	\$ 2,991
WI	103	\$ 255,605	\$ 2,482
WV	13	\$ 33,571	\$ 2,582
WY	3	\$ 10,433	\$ 3,478
Total	8,092	\$ 15,379,896	\$ 1,901

Exhibit 2a
Continental General Insurance Company
Nationwide Historic Experience by Calendar and Issue Year (excluding FL)
All Policies Combined
4LTCIP0001, 4LTCIP0002

Calendar Year	Issue Year	Premium	Original RtLvl Prem	State RtLvl Prem	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
2005	2005	0	0	0	0	0	0	0	0.0%	1
2006	2005	299,757	299,757	299,757	0	0	0	0	0.0%	2
2006	2006	486,350	486,350	486,350	0	0	0	0	0.0%	1
2007	2005	0	0	0	0	0	0	0	0.0%	3
2007	2006	1,682,219	1,682,219	1,682,219	31,378	0	0	31,378	1.9%	2
2007	2007	4,049,224	4,049,224	4,049,224	428,624	2,590	0	431,214	10.6%	1
2008	2005	0	0	0	0	0	0	0	0.0%	4
2008	2006	1,611,099	1,611,099	1,611,099	27,829	0	0	27,829	1.7%	3
2008	2007	6,813,444	6,813,444	6,813,444	249,542	0	0	249,542	3.7%	2
2008	2008	5,082,135	5,082,135	5,082,135	227,388	0	0	227,388	4.5%	1
2009	2005	0	0	0	0	0	0	0	0.0%	5
2009	2006	1,528,673	1,528,673	1,528,673	129,223	0	0	129,223	8.5%	4
2009	2007	6,079,831	6,079,831	6,079,831	570,869	0	0	570,869	9.4%	3
2009	2008	6,557,118	6,557,118	6,557,118	175,884	0	0	175,884	2.7%	2
2009	2009	2,150,083	2,150,083	2,150,083	4,126	0	0	4,126	0.2%	1
2010	2005	0	0	0	0	0	0	0	0.0%	6
2010	2006	1,499,054	1,499,054	1,499,054	227,523	0	0	227,523	15.2%	5
2010	2007	5,845,990	5,845,990	5,845,990	841,429	0	0	841,429	14.4%	4
2010	2008	6,151,338	6,151,338	6,151,338	239,686	0	0	239,686	3.9%	3
2010	2009	3,473,226	3,473,226	3,473,226	117,508	0	0	117,508	3.4%	2
2010	2010	140,722	140,722	140,722	0	0	0	0	0.0%	1
2011	2005	0	0	0	0	0	0	0	0.0%	7
2011	2006	1,440,921	1,440,921	1,440,921	405,192	33,477	0	438,669	30.4%	6
2011	2007	5,588,660	5,588,660	5,588,660	985,191	0	0	985,191	17.6%	5
2011	2008	5,532,537	5,532,537	5,532,537	102,219	0	0	102,219	1.8%	4
2011	2009	2,976,038	2,976,038	2,976,038	143,530	0	0	143,530	4.8%	3
2011	2010	104,654	104,654	104,654	0	0	0	0	0.0%	2
2012	2005	0	0	0	0	0	0	0	0.0%	8
2012	2006	1,287,509	1,287,509	1,287,509	173,998	0	0	173,998	13.5%	7
2012	2007	5,397,469	5,397,469	5,397,469	406,561	0	0	406,561	7.5%	6
2012	2008	5,367,124	5,367,124	5,367,124	150,808	0	0	150,808	2.8%	5
2012	2009	2,825,699	2,825,699	2,825,699	219,017	0	0	219,017	7.8%	4
2012	2010	100,307	100,307	100,307	0	0	0	0	0.0%	3
2013	2005	0	0	0	0	0	0	0	0.0%	9
2013	2006	1,273,511	1,273,511	1,273,511	153,985	0	0	153,985	12.1%	8
2013	2007	5,215,240	5,215,240	5,215,240	697,157	132,946	0	830,103	15.9%	7
2013	2008	5,168,740	5,168,740	5,168,740	1,059,423	33,746	0	1,093,169	21.1%	6
2013	2009	2,725,941	2,725,941	2,725,941	1,539	0	0	1,539	0.1%	5
2013	2010	101,248	101,248	101,248	0	0	0	0	0.0%	4
2014	2005	0	0	0	0	0	0	0	0.0%	10
2014	2006	1,239,639	1,228,495	1,228,495	115,313	0	0	115,313	9.3%	9
2014	2007	5,115,196	5,069,213	5,069,213	589,151	23,174	0	612,325	12.0%	8
2014	2008	5,045,280	4,999,926	4,999,926	983,948	168,067	0	1,152,015	22.8%	7
2014	2009	2,639,411	2,615,684	2,615,684	131,470	33,028	0	164,497	6.2%	6
2014	2010	97,574	96,697	96,697	0	0	0	0	0.0%	5
2015	2005	0	0	0	0	0	0	0	0.0%	11
2015	2006	1,259,133	1,132,765	1,234,405	304,505	162,047	0	466,552	37.1%	10
2015	2007	5,367,847	4,829,123	5,262,429	953,312	95,889	0	1,049,201	19.5%	9
2015	2008	5,208,081	4,685,392	5,105,801	903,769	567,431	0	1,471,200	28.2%	8
2015	2009	2,683,954	2,414,589	2,631,244	607,881	0	0	607,881	22.6%	7
2015	2010	99,039	89,100	97,094	0	0	0	0	0.0%	6
2016	2005	0	0	0	0	0	0	0	0.0%	12
2016	2006	1,275,882	1,111,537	1,319,464	651,639	176,147	0	827,786	64.9%	11
2016	2007	5,386,332	4,692,526	5,570,319	594,997	42,080	0	637,077	11.8%	10
2016	2008	5,262,736	4,584,850	5,442,501	1,091,581	722,705	0	1,814,286	34.5%	9
2016	2009	2,683,176	2,337,559	2,774,828	140,629	0	0	140,629	5.2%	8
2016	2010	99,687	86,847	103,092	0	0	0	0	0.0%	7

Exhibit 2a
Continental General Insurance Company
Nationwide Historic Experience by Calendar and Issue Year (excluding FL)
All Policies Combined
4LTCIP0001, 4LTCIP0002

Calendar Year	Issue Year	Premium	Original RtLvl Prem	State RtLvl Prem	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
2017	2005	0	0	0	0	0	0	0	0.0%	13
2017	2006	1,262,476	996,529	1,328,604	416,508	583,400	2,686	1,002,594	79.4%	12
2017	2007	5,517,948	4,355,565	5,806,979	1,116,365	849,349	11,740	1,977,454	35.8%	11
2017	2008	5,457,299	4,307,692	5,743,152	731,108	807,594	11,611	1,550,313	28.4%	10
2017	2009	2,739,519	2,162,426	2,883,015	69,863	104,476	5,829	180,168	6.6%	9
2017	2010	98,077	77,416	103,214	0	0	209	209	0.2%	8
2018	2005	0	0	0	0	0	0	0	0.0%	14
2018	2006	1,275,388	935,869	1,349,864	242,491	672,777	16,840	932,108	73.1%	13
2018	2007	5,515,167	4,046,982	5,837,222	741,883	1,719,862	72,822	2,534,567	46.0%	12
2018	2008	5,422,613	3,979,067	5,739,264	431,045	867,144	71,600	1,369,789	25.3%	11
2018	2009	2,713,136	1,990,876	2,871,568	143,637	53,293	35,824	232,754	8.6%	10
2018	2010	99,605	73,089	105,421	0	0	1,315	1,315	1.3%	9
2019	2005	0	0	0	0	0	0	0	0.0%	15
2019	2006	967,752	663,319	1,073,591	7,434	670,398	38,123	715,955	74.0%	14
2019	2007	4,216,803	2,890,293	4,677,979	83,448	989,252	166,114	1,238,814	29.4%	13
2019	2008	4,107,859	2,815,620	4,557,119	111,574	1,856,012	161,822	2,129,408	51.8%	12
2019	2009	2,018,625	1,383,611	2,239,394	31,294	733,105	79,520	843,919	41.8%	11
2019	2010	74,777	51,254	82,955	0	90,433	2,946	93,378	124.9%	10
2005	Total	0	0	0	0	0	0	0	0.0%	NA
2006	Total	786,107	786,107	786,107	0	0	0	0	0.0%	NA
2007	Total	5,731,442	5,731,442	5,731,442	460,002	2,590	0	462,592	8.1%	NA
2008	Total	13,506,678	13,506,678	13,506,678	504,759	0	0	504,759	3.7%	NA
2009	Total	16,315,706	16,315,706	16,315,706	880,102	0	0	880,102	5.4%	NA
2010	Total	17,110,329	17,110,329	17,110,329	1,426,145	0	0	1,426,145	8.3%	NA
2011	Total	15,642,809	15,642,809	15,642,809	1,636,132	33,477	0	1,669,608	10.7%	NA
2012	Total	14,978,108	14,978,108	14,978,108	950,385	0	0	950,385	6.3%	NA
2013	Total	14,484,679	14,484,679	14,484,679	1,912,104	166,693	0	2,078,796	14.4%	NA
2014	Total	14,137,100	14,010,016	14,010,016	1,819,882	224,268	0	2,044,150	14.5%	NA
2015	Total	14,618,054	13,150,968	14,330,974	2,769,468	825,367	0	3,594,834	24.6%	NA
2016	Total	14,707,814	12,813,319	15,210,205	2,478,847	940,932	0	3,419,779	23.3%	NA
2017	Total	15,075,319	11,899,628	15,864,964	2,333,845	2,344,818	32,075	4,710,738	31.2%	NA
2018	Total	15,025,909	11,025,884	15,903,339	1,559,056	3,313,077	198,402	5,070,534	33.7%	NA
2019	Total	11,385,815	7,804,096	12,631,037	233,750	4,339,200	448,525	5,021,475	44.1%	NA
Total	Total	183,505,869	169,259,769	186,506,393	18,964,476	12,190,421	679,002	31,833,899	17.3%	NA

Exhibit 2b
Continental General Insurance Company
Pennsylvania Historic Experience by Calendar and Issue Year
All Policies Combined
4LTCIP0001

Calendar Year	Issue Year	Premium	Original Rtlvl Prem	State Rtlvl Prem	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
2005	2005	0	0	0	0	0	0	0	0.0%	1
2006	2005	0	0	0	0	0	0	0	0.0%	2
2006	2006	0	0	0	0	0	0	0	0.0%	1
2007	2005	0	0	0	0	0	0	0	0.0%	3
2007	2006	0	0	0	0	0	0	0	0.0%	2
2007	2007	249,784	249,784	249,784	0	0	0	0	0.0%	1
2008	2005	0	0	0	0	0	0	0	0.0%	4
2008	2006	0	0	0	0	0	0	0	0.0%	3
2008	2007	568,486	568,486	568,486	0	0	0	0	0.0%	2
2008	2008	190,052	190,052	190,052	0	0	0	0	0.0%	1
2009	2005	0	0	0	0	0	0	0	0.0%	5
2009	2006	0	0	0	0	0	0	0	0.0%	4
2009	2007	480,729	480,729	480,729	149,154	0	0	149,154	31.0%	3
2009	2008	303,474	303,474	303,474	0	0	0	0	0.0%	2
2009	2009	92,387	92,387	92,387	0	0	0	0	0.0%	1
2010	2005	0	0	0	0	0	0	0	0.0%	6
2010	2006	0	0	0	0	0	0	0	0.0%	5
2010	2007	463,454	463,454	463,454	0	0	0	0	0.0%	4
2010	2008	291,714	291,714	291,714	0	0	0	0	0.0%	3
2010	2009	169,897	169,897	169,897	0	0	0	0	0.0%	2
2010	2010	2,143	2,143	2,143	0	0	0	0	0.0%	1
2011	2005	0	0	0	0	0	0	0	0.0%	7
2011	2006	0	0	0	0	0	0	0	0.0%	6
2011	2007	466,705	466,705	466,705	349,302	0	0	349,302	74.8%	5
2011	2008	283,193	283,193	283,193	0	0	0	0	0.0%	4
2011	2009	160,962	160,962	160,962	0	0	0	0	0.0%	3
2011	2010	2,149	2,149	2,149	0	0	0	0	0.0%	2
2012	2005	0	0	0	0	0	0	0	0.0%	8
2012	2006	0	0	0	0	0	0	0	0.0%	7
2012	2007	454,133	454,133	454,133	0	0	0	0	0.0%	6
2012	2008	279,083	279,083	279,083	0	0	0	0	0.0%	5
2012	2009	160,888	160,888	160,888	0	0	0	0	0.0%	4
2012	2010	2,149	2,149	2,149	0	0	0	0	0.0%	3
2013	2005	0	0	0	0	0	0	0	0.0%	9
2013	2006	0	0	0	0	0	0	0	0.0%	8
2013	2007	446,062	446,062	446,062	0	0	0	0	0.0%	7
2013	2008	268,601	268,601	268,601	0	0	0	0	0.0%	6
2013	2009	160,533	160,533	160,533	0	0	0	0	0.0%	5
2013	2010	2,149	2,149	2,149	0	0	0	0	0.0%	4
2014	2005	0	0	0	0	0	0	0	0.0%	10
2014	2006	0	0	0	0	0	0	0	0.0%	9
2014	2007	436,742	436,742	436,742	133,590	0	0	133,590	30.6%	8
2014	2008	258,614	258,614	258,614	0	0	0	0	0.0%	7
2014	2009	157,813	157,813	157,813	0	0	0	0	0.0%	6
2014	2010	2,149	2,149	2,149	0	0	0	0	0.0%	5
2015	2005	0	0	0	0	0	0	0	0.0%	11
2015	2006	0	0	0	0	0	0	0	0.0%	10
2015	2007	452,815	415,531	452,815	38,759	0	0	38,759	8.6%	9
2015	2008	267,774	245,726	267,774	0	0	0	0	0.0%	8
2015	2009	166,858	153,119	166,858	0	0	0	0	0.0%	7
2015	2010	2,149	1,972	2,149	0	0	0	0	0.0%	6
2016	2005	0	0	0	0	0	0	0	0.0%	12
2016	2006	0	0	0	0	0	0	0	0.0%	11
2016	2007	456,373	384,456	456,373	0	0	0	0	0.0%	10
2016	2008	281,548	237,181	281,548	0	0	0	0	0.0%	9
2016	2009	175,093	147,501	175,093	27,522	0	0	27,522	15.7%	8
2016	2010	2,471	2,081	2,471	0	0	0	0	0.0%	7
2017	2005	0	0	0	0	0	0	0	0.0%	13
2017	2006	0	0	0	0	0	0	0	0.0%	12
2017	2007	473,322	355,019	473,322	99,585	70,996	1,007	171,588	36.3%	11
2017	2008	296,775	222,598	296,775	0	0	631	631	0.2%	10
2017	2009	185,360	139,031	185,360	0	0	394	394	0.2%	9
2017	2010	2,964	2,223	2,964	0	0	6	6	0.2%	8
2018	2005	0	0	0	0	0	0	0	0.0%	14
2018	2006	0	0	0	0	0	0	0	0.0%	13
2018	2007	473,686	328,409	473,686	31,796	94,343	6,255	132,394	27.9%	12
2018	2008	278,282	192,935	278,282	63,504	114,653	3,674	181,831	65.3%	11
2018	2009	182,270	126,369	182,270	35,711	0	2,407	38,118	20.9%	10
2018	2010	2,966	2,056	2,966	0	0	39	39	1.3%	9
2019	2005	0	0	0	0	0	0	0	0.0%	15
2019	2006	0	0	0	0	0	0	0	0.0%	14
2019	2007	378,033	233,568	378,033	0	0	14,892	14,892	3.9%	13
2019	2008	210,574	130,104	210,574	0	440,295	8,295	448,590	213.0%	12
2019	2009	138,544	85,599	138,544	0	0	5,458	5,458	3.9%	11
2019	2010	2,307	1,425	2,307	0	0	91	91	3.9%	10

Exhibit 2b
Continental General Insurance Company
Pennsylvania Historic Experience by Calendar and Issue Year
All Policies Combined
4LTCIP0001

Calendar Year	Issue Year	Premium	Original Rtlvl Prem	State Rtlvl Prem	Paid Claims	Reserves	IBNR	Total Incurred Claims	Loss Ratio	Calendar Year Duration
2005	Total	0	0	0	0	0	0	0	0.0%	NA
2006	Total	0	0	0	0	0	0	0	0.0%	NA
2007	Total	249,784	249,784	249,784	0	0	0	0	0.0%	NA
2008	Total	758,538	758,538	758,538	0	0	0	0	0.0%	NA
2009	Total	876,590	876,590	876,590	149,154	0	0	149,154	17.0%	NA
2010	Total	927,208	927,208	927,208	0	0	0	0	0.0%	NA
2011	Total	913,009	913,009	913,009	349,302	0	0	349,302	38.3%	NA
2012	Total	896,253	896,253	896,253	0	0	0	0	0.0%	NA
2013	Total	877,345	877,345	877,345	0	0	0	0	0.0%	NA
2014	Total	855,318	855,318	855,318	133,590	0	0	133,590	15.6%	NA
2015	Total	889,597	816,348	889,597	38,759	0	0	38,759	4.4%	NA
2016	Total	915,484	771,219	915,484	27,522	0	0	27,522	3.0%	NA
2017	Total	958,421	718,871	958,421	99,585	70,996	2,039	172,620	18.0%	NA
2018	Total	937,204	649,769	937,204	131,011	208,996	12,375	352,382	37.6%	NA
2019	Total	729,458	450,696	729,458	0	440,295	28,736	469,031	64.3%	NA
Total	Total	10,784,209	9,760,947	10,784,209	928,921	720,287	43,150	1,692,358	15.7%	NA

Exhibit 3a
Continental General Insurance Company
Nationwide Experience (Excluding Florida)
All Policies Combined
Policy Forms: 4LTCIP0001, 4LTCIP0002

Calendar Year	Without Proposed Rate Increase										With Proposed 15% Rate Increase		
	Premium			By Incurral Year				Incurred Loss Ratio			Premium	Incurred	Inc'd LR
	Actual	Original Rtlvl	State Rtlvl	Pd Clms	Cim Res	IBNR	Inc Clms	Actual	State Rtlvl		State Rtlvl	Claims	State Rtlvl
2006	786,107	786,107	786,107	0	0	0	0	0.0%	0.0%		786,107	0	0.0%
2007	5,731,442	5,731,442	5,731,442	460,002	2,590	0	462,592	8.1%	8.1%		5,731,442	462,592	8.1%
2008	13,506,678	13,506,678	13,506,678	504,759	0	0	504,759	3.7%	3.7%		13,506,678	504,759	3.7%
2009	16,315,706	16,315,706	16,315,706	880,102	0	0	880,102	5.4%	5.4%		16,315,706	880,102	5.4%
2010	17,110,329	17,110,329	17,110,329	1,426,145	0	0	1,426,145	8.3%	8.3%		17,110,329	1,426,145	8.3%
2011	15,642,809	15,642,809	15,642,809	1,636,132	33,477	0	1,669,608	10.7%	10.7%		15,642,809	1,669,608	10.7%
2012	14,978,108	14,978,108	14,978,108	950,385	0	0	950,385	6.3%	6.3%		14,978,108	950,385	6.3%
2013	14,484,679	14,484,679	14,484,679	1,912,104	166,693	0	2,078,796	14.4%	14.4%		14,484,679	2,078,796	14.4%
2014	14,137,100	14,010,016	14,010,016	1,819,882	224,268	0	2,044,150	14.5%	14.6%		14,010,016	2,044,150	14.6%
2015	14,618,054	13,150,968	14,330,974	2,769,468	825,367	0	3,594,834	24.6%	25.1%		14,330,974	3,594,834	25.1%
2016	14,707,814	12,813,319	15,210,205	2,478,847	940,932	0	3,419,779	23.3%	22.5%		15,210,205	3,419,779	22.5%
2017	15,075,319	11,899,628	15,864,964	2,333,845	2,344,818	32,075	4,710,738	31.2%	29.7%		15,864,964	4,710,738	29.7%
2018	15,025,909	11,025,884	15,903,339	1,559,056	3,313,077	198,402	5,070,534	33.7%	31.9%		15,903,339	5,070,534	31.9%
Jan-Sept 2019	11,385,815	7,804,096	12,631,037	233,750	4,339,200	448,525	5,021,475	44.1%	39.8%		12,631,037	5,021,475	39.8%
Oct-Dec													
2019		2,702,205	4,373,556				1,471,072	33.6%			4,373,556	1,471,072	33.6%
2020		10,654,169	20,128,282				6,624,791	32.9%			20,128,282	6,624,791	32.9%
2021		10,399,320	20,665,528				7,635,231	36.9%			21,353,097	7,607,660	35.6%
2022		10,133,884	20,138,053				8,688,957	43.1%			22,426,973	8,578,682	38.3%
2023		9,830,450	19,535,070				9,808,333	50.2%			21,825,068	9,676,332	44.3%
2024		9,511,028	18,900,316				10,977,847	58.1%			21,115,905	10,825,865	51.3%
2025		9,183,449	18,249,350				12,189,524	66.8%			20,388,630	12,015,800	58.9%
2026		8,829,922	17,546,821				13,427,330	76.5%			19,603,747	13,230,255	67.5%
2027		8,431,353	16,754,784				14,674,815	87.6%			18,718,864	14,452,987	77.2%
2028		8,023,638	15,944,573				15,925,101	99.9%			17,813,675	15,677,336	88.0%
2029		7,607,124	15,116,877				17,161,228	113.5%			16,888,953	16,886,599	100.0%
2030		7,179,872	14,267,842				18,350,231	128.6%			15,940,390	18,048,564	113.2%
2031		6,742,308	13,398,313				19,450,983	145.2%			14,968,931	19,122,932	127.8%
2032		6,301,105	12,521,556				20,431,760	163.2%			13,989,395	20,078,715	143.5%
2033		5,860,532	11,646,049				21,279,664	182.7%			13,011,257	20,903,461	160.7%
2034		5,423,778	10,778,132				21,979,194	203.9%			12,041,598	21,582,094	179.2%
2035		4,993,851	9,923,781				22,495,704	226.7%			11,087,097	22,080,921	199.2%
2036		4,573,774	9,089,003				22,795,134	250.8%			10,154,462	22,366,639	220.3%
2037		4,166,501	8,279,671				22,869,188	276.2%			9,250,255	22,431,364	242.5%
2038		3,774,791	7,501,265				22,735,851	303.1%			8,380,601	22,292,932	266.0%
2039		3,400,989	6,758,445				22,411,077	331.6%			7,550,704	21,967,131	290.9%
2040		3,047,205	6,055,405				21,897,994	361.6%			6,765,250	21,457,249	317.2%
2041		2,715,239	5,395,722				21,194,329	392.8%			6,028,236	20,761,207	344.4%
2042		2,406,454	4,782,104				20,316,287	424.8%			5,342,687	19,895,092	372.4%
2043		2,121,598	4,216,039				19,299,289	457.8%			4,710,265	18,893,642	401.1%
2044		1,860,962	3,698,105				18,183,068	491.7%			4,131,615	17,795,766	430.7%
2045		1,624,155	3,227,521				17,018,175	527.3%			3,605,867	16,650,922	461.8%
2046		1,410,848	2,803,637				15,827,684	564.5%			3,132,293	15,481,749	494.3%
2047		1,220,442	2,425,262				14,620,029	602.8%			2,709,564	14,296,568	527.6%
2048		1,051,555	2,089,651				13,416,491	642.0%			2,334,610	13,116,149	561.8%
2049		902,783	1,794,011				12,243,502	682.5%			2,004,314	11,966,310	597.0%
2050		772,535	1,535,182				11,141,554	725.7%			1,715,144	10,886,553	634.7%
2051		659,152	1,309,866				10,108,070	771.7%			1,463,415	9,874,358	674.7%
2052		561,040	1,114,899				9,132,244	819.1%			1,245,593	8,919,109	716.1%
2053		476,643	947,185				8,230,383	868.9%			1,058,218	8,036,618	759.4%
2054		404,365	803,554				7,410,055	922.2%			897,750	7,234,237	805.8%
2055		342,664	680,942				6,670,931	979.7%			760,765	6,511,592	855.9%
2056		290,118	576,522				5,996,466	1040.1%			644,105	5,852,484	908.6%
2057		245,459	487,776				5,365,398	1100.0%			544,955	5,236,079	960.8%
2058		207,587	412,517				4,782,802	1159.4%			460,874	4,667,267	1012.7%
2059		175,498	348,750				4,256,197	1220.4%			389,632	4,153,299	1066.0%
2060		148,283	294,668				3,787,741	1285.4%			329,211	3,696,246	1122.8%
2061		125,166	248,729				3,366,084	1353.3%			277,887	3,284,993	1182.1%
2062		105,503	209,656				2,976,653	1419.8%			234,232	2,905,244	1240.3%
2063		88,770	176,404				2,620,585	1485.6%			197,083	2,558,137	1298.0%
2064		74,527	148,100				2,300,668	1553.5%			165,461	2,246,313	1357.6%
2065		62,385	123,971				2,016,655	1626.7%			138,503	1,969,538	1422.0%
2066		52,022	103,377				1,758,899	1701.4%			115,496	1,718,334	1487.8%
2067		43,189	85,824				1,524,157	1775.9%			95,885	1,489,521	1553.4%
2068		35,681	70,906				1,313,988	1853.1%			79,218	1,284,671	1621.7%
2069		29,325	58,274				1,126,892	1933.8%			65,105	1,102,247	1693.0%
2070		23,956	47,606				963,198	2023.3%			53,187	942,605	1772.3%
2071		19,437	38,624				818,535	2119.2%			43,152	801,475	1857.3%
2072		15,654	31,107				687,125	2208.9%			34,754	673,160	1936.9%
2073		12,510	24,860				571,137	2297.4%			27,774	559,860	2015.7%
2074		9,917	19,707				470,541	2387.7%			22,017	461,523	2096.2%
2075		7,789	15,479				384,333	2482.9%			17,294	377,188	2181.1%
2076		6,057	12,036				308,421	2562.6%			13,446	302,831	2252.1%
2077		4,660	9,261				243,983	2634.6%			10,346	239,665	2316.4%
2078		3,551	7,056				193,548	2743.1%			7,883	190,235	2413.3%
Without Interest													
Past	183,505,869	169,259,769	186,506,393	18,964,476	12,190,421	679,002	31,833,899	17.3%	17.1%		186,506,393	31,833,899	17.1%
Future		171,088,724	337,947,564				607,927,104	179.9%			372,884,527	596,412,164	159.9%
Lifetime		340,348,493	524,453,957				639,761,004	122.0%			559,390,921	628,246,063	112.3%
With 4% Interest													
Past	235,748,529	220,402,671	238,871,613	23,608,745	13,027,110	698,576	37,334,431	15.8%	15.6%		238,871,613	37,334,431	15.6%
Future		117,592,719	231,675,428				302,355,797	130.5%			254,347,967	297,069,968	116.8%
Lifetime		337,995,390	470,547,040				339,690,228	72.2%			493,219,580	334,404,400	67.8%

Exhibit 3b
Continental General Insurance Company
Nationwide Experience (Excluding Florida)
Premium Paying Policies Only
Policy Forms: 4LTCIP0001, 4LTCIP0002

Calendar	Without Proposed Rate Increase										With Proposed 15% Rate Increase		
	Premium			By Incurred Year				Incurred Loss Ratio			Premium	Incurred	Inc'd LR
	Actual	Original Rtlvl	State Rtlvl	Pd Cims	Cim Res	IBNR	Inc Cims	Actual	State Rtlvl		State Rtlvl	Claims	State Rtlvl
2006	361,165	361,165	361,165	0	0	0	0	0.0%	0.0%		361,165	0	0.0%
2007	4,526,105	4,526,105	4,526,105	460,002	2,590	0	462,592	10.2%	10.2%		4,526,105	462,592	10.2%
2008	10,631,659	10,631,659	10,631,659	504,759	0	0	504,759	4.7%	4.7%		10,631,659	504,759	4.7%
2009	14,150,569	14,150,569	14,150,569	880,102	0	0	880,102	6.2%	6.2%		14,150,569	880,102	6.2%
2010	14,954,759	14,954,759	14,954,759	1,426,145	0	0	1,426,145	9.5%	9.5%		14,954,759	1,426,145	9.5%
2011	13,535,052	13,535,052	13,535,052	1,604,624	33,477	0	1,638,101	12.1%	12.1%		13,535,052	1,638,101	12.1%
2012	13,010,175	13,010,175	13,010,175	950,385	0	0	950,385	7.3%	7.3%		13,010,175	950,385	7.3%
2013	12,616,176	12,616,176	12,616,176	1,912,105	166,693	0	2,078,797	16.5%	16.5%		12,616,176	2,078,797	16.5%
2014	12,351,877	12,240,841	12,240,841	1,780,892	224,268	0	2,005,160	16.2%	16.4%		12,240,841	2,005,160	16.4%
2015	13,070,153	11,758,417	12,813,472	2,769,468	825,367	0	3,594,834	27.5%	28.1%		12,813,472	3,594,834	28.1%
2016	13,269,463	11,560,240	13,722,722	2,478,522	940,932	0	3,419,454	25.8%	24.9%		13,722,722	3,419,454	24.9%
2017	14,107,153	11,135,411	14,846,086	2,296,529	2,344,818	30,015	4,671,362	33.1%	31.5%		14,846,086	4,671,362	31.5%
2018	14,586,397	10,703,373	15,438,161	1,506,237	3,297,581	192,599	4,996,417	34.3%	32.4%		15,438,161	4,996,417	32.4%
2019	11,327,063	7,763,826	12,565,860	223,398	4,288,539	446,210	4,958,147	43.8%	39.5%		12,565,860	4,958,147	39.5%
2019		2,702,205	4,373,556				1,421,618		32.5%		4,373,556	1,421,618	32.5%
2020		10,654,169	20,128,282				6,410,800		31.8%		20,128,282	6,410,800	31.8%
2021		10,399,320	20,665,528				7,392,582		35.8%		21,353,097	7,365,010	34.5%
2022		10,133,884	20,138,053				8,416,595		41.8%		22,426,973	8,306,320	37.0%
2023		9,830,450	19,535,070				9,505,287		48.7%		21,825,068	9,373,285	42.9%
2024		9,511,028	18,900,316				10,643,410		56.3%		21,115,905	10,491,429	49.7%
2025		9,183,449	18,249,350				11,822,527		64.8%		20,388,630	11,648,803	57.1%
2026		8,829,922	17,546,821				13,026,400		74.2%		19,603,747	12,829,324	65.4%
2027		8,431,353	16,754,784				14,239,209		85.0%		18,718,864	14,017,382	74.9%
2028		8,023,638	15,944,573				15,453,928		96.9%		17,813,675	15,206,163	85.4%
2029		7,607,124	15,116,877				16,654,096		110.2%		16,888,953	16,379,467	97.0%
2030		7,179,872	14,267,842				17,806,473		124.8%		15,940,390	17,504,806	109.8%
2031		6,742,308	13,398,313				18,870,553		140.8%		14,968,931	18,542,502	123.9%
2032		6,301,105	12,521,556				19,816,464		158.3%		13,989,395	19,463,419	139.1%
2033		5,860,532	11,646,049				20,631,121		177.2%		13,011,257	20,254,918	155.7%
2034		5,423,778	10,778,132				21,300,573		197.6%		12,041,598	20,903,472	173.6%
2035		4,993,851	9,923,781				21,792,649		219.6%		11,087,097	21,377,866	192.8%
2036		4,573,774	9,089,003				22,075,512		242.9%		10,154,462	21,647,017	213.2%
2037		4,166,501	8,279,671				22,140,096		267.4%		9,250,255	21,702,273	234.6%
2038		3,774,791	7,501,265				22,003,739		293.3%		8,380,601	21,560,820	257.3%
2039		3,400,989	6,758,445				21,684,697		320.9%		7,550,704	21,240,751	281.3%
2040		3,047,205	6,055,405				21,187,902		349.9%		6,765,250	20,747,157	306.7%
2041		2,715,239	5,395,722				20,510,021		380.1%		6,028,236	20,076,899	333.0%
2042		2,406,454	4,782,104				19,663,326		411.2%		5,342,687	19,242,131	360.2%
2043		2,121,598	4,216,039				18,683,143		443.1%		4,710,265	18,277,496	388.0%
2044		1,860,962	3,698,105				17,609,678		476.2%		4,131,615	17,222,375	416.8%
2045		1,624,155	3,227,521				16,491,171		511.0%		3,605,867	16,123,917	447.2%
2046		1,410,848	2,803,637				15,347,713		547.4%		3,132,293	15,001,778	478.9%
2047		1,220,442	2,425,262				14,185,408		584.9%		2,709,564	13,861,946	511.6%
2048		1,051,555	2,089,651				13,025,813		623.3%		2,334,610	12,725,471	545.1%
2049		902,783	1,794,011				11,894,160		663.0%		2,004,314	11,616,968	579.6%
2050		772,535	1,535,182				10,828,955		705.4%		1,715,144	10,573,953	616.5%
2051		659,152	1,309,866				9,827,038		750.2%		1,463,415	9,593,325	655.5%
2052		561,040	1,114,899				8,878,503		796.4%		1,245,593	8,665,367	695.7%
2053		476,643	947,185				8,000,020		844.6%		1,058,218	7,806,255	737.7%
2054		404,365	803,554				7,198,054		895.8%		897,750	7,022,236	782.2%
2055		342,664	680,942				6,471,887		950.4%		760,765	6,312,548	829.8%
2056		290,118	576,522				5,805,778		1007.0%		644,105	5,661,796	879.0%
2057		245,459	487,776				5,180,711		1062.1%		544,955	5,051,392	926.9%
2058		207,587	412,517				4,601,238		1115.4%		460,874	4,485,703	973.3%
2059		175,498	348,750				4,075,925		1168.7%		389,632	3,973,026	1019.7%
2060		148,283	294,668				3,606,393		1223.9%		329,211	3,514,897	1067.7%
2061		125,166	248,729				3,182,159		1279.4%		277,887	3,101,068	1115.9%
2062		105,503	209,656				2,791,305		1331.4%		234,232	2,719,895	1161.2%
2063		88,770	176,404				2,432,555		1379.0%		197,083	2,370,107	1202.6%
2064		74,527	148,100				2,110,708		1425.2%		165,461	2,056,353	1242.8%
2065		62,385	123,971				1,824,438		1471.7%		138,503	1,777,322	1283.2%
2066		52,022	103,377				1,566,752		1515.6%		115,496	1,526,187	1321.4%
2067		43,189	85,824				1,334,714		1555.2%		95,885	1,300,078	1355.9%
2068		35,681	70,906				1,127,504		1590.1%		79,218	1,098,187	1386.3%
2069		29,325	58,274				946,095		1623.5%		65,105	921,450	1415.3%
2070		23,956	47,606				789,221		1657.8%		53,187	768,628	1445.2%
2071		19,437	38,624				652,875		1690.3%		43,152	635,816	1473.4%
2072		15,654	31,107				533,795		1716.0%		34,754	519,830	1495.8%
2073		12,510	24,860				430,623		1732.2%		27,774	419,345	1509.8%
2074		9,917	19,707				344,010		1745.6%		22,017	334,992	1521.5%
2075		7,789	15,479				272,312		1759.2%		17,294	265,167	1533.3%
2076		6,057	12,036				212,900		1768.9%		13,446	207,310	1541.7%
2077		4,660	9,261				164,393		1775.2%		10,346	160,075	1547.2%
2078		3,551	7,056				126,068		1786.7%		7,883	122,755	1557.2%
Without Interest													
Past	162,497,765	148,947,768	165,412,802	18,793,168	12,124,264	668,824	31,586,256	19.4%	19.1%		165,412,802	31,586,256	19.1%
Future		171,088,724	337,947,564				587,023,591		173.7%		372,884,527	575,508,651	154.3%
Lifetime		320,036,492	503,360,366				618,609,847		122.9%		538,297,329	607,094,907	112.8%
With 4% Interest													
Past	207,130,409	192,562,657	210,164,445	23,410,191	12,959,424	687,882	37,057,497	17.9%	17.6%		210,164,445	37,057,497	17.6%
Future		117,592,719	231,675,428				292,727,342		126.4%		254,347,967	287,441,514	113.0%
Lifetime		310,155,375	441,839,873				329,784,840		74.6%		464,512,412	324,499,011	69.9%

Exhibit 4a
Continental General Insurance Company
Pennsylvania Experience
All Policies Combined
Policy Forms: 4LTCIP0001

Calendar Year	Without Proposed Rate Increase										With Proposed 15% Rate Increase		
	Premium			By Incurral Year				Incurred Loss Ratio			Premium	Incurred	Incld LR
	Actual	Original Rtlvl	State Rtlvl	Pd Clms	Clm Res	IBNR	Inc Clms	Actual	State Rtlvl		State Rtlvl	Claims	State Rtlvl
2006	0	0	0	0	0	0	0	0.0%	0.0%		0	0	0.0%
2007	249,784	249,784	249,784	0	0	0	0	0.0%	0.0%		249,784	0	0.0%
2008	758,538	758,538	758,538	0	0	0	0	0.0%	0.0%		758,538	0	0.0%
2009	876,590	876,590	876,590	149,154	0	0	149,154	17.0%	17.0%		876,590	149,154	17.0%
2010	927,208	927,208	927,208	0	0	0	0	0.0%	0.0%		927,208	0	0.0%
2011	913,009	913,009	913,009	349,302	0	0	349,302	38.3%	38.3%		913,009	349,302	38.3%
2012	896,253	896,253	896,253	0	0	0	0	0.0%	0.0%		896,253	0	0.0%
2013	877,345	877,345	877,345	0	0	0	0	0.0%	0.0%		877,345	0	0.0%
2014	855,318	855,318	855,318	133,590	0	0	133,590	15.6%	15.6%		855,318	133,590	15.6%
2015	889,597	816,348	889,597	38,759	0	0	38,759	4.4%	4.4%		889,597	38,759	4.4%
2016	915,484	771,219	915,484	27,522	0	0	27,522	3.0%	3.0%		915,484	27,522	3.0%
2017	958,421	718,871	958,421	99,585	70,996	2,039	172,620	18.0%	18.0%		958,421	172,620	18.0%
2018	937,204	649,769	937,204	131,011	208,996	12,375	352,382	37.6%	37.6%		937,204	352,382	37.6%
2019	729,458	450,696	729,458	0	440,295	28,736	469,031	64.3%	64.3%		729,458	469,031	64.3%
2019	151,809	245,704	245,704				82,107	33.4%	33.4%		245,704	82,107	33.4%
2020	598,775	1,131,230	1,131,230				374,508	33.1%	33.1%		1,131,230	374,508	33.1%
2021	584,902	1,162,317	1,162,317				433,805	37.3%	37.3%		1,200,989	432,286	36.0%
2022	565,497	1,123,756	1,123,756				496,625	44.2%	44.2%		1,251,483	490,555	39.2%
2023	539,279	1,071,654	1,071,654				565,041	52.7%	52.7%		1,197,279	557,761	46.6%
2024	521,730	1,036,782	1,036,782				637,527	61.5%	61.5%		1,158,318	629,114	54.3%
2025	503,047	999,655	999,655				714,733	71.5%	71.5%		1,116,839	705,049	63.1%
2026	482,827	959,473	959,473				795,014	82.9%	82.9%		1,071,947	783,948	73.1%
2027	461,191	916,479	916,479				877,288	95.7%	95.7%		1,023,914	864,729	84.5%
2028	438,331	871,051	871,051				960,783	110.3%	110.3%		973,160	946,642	97.3%
2029	414,408	823,511	823,511				1,043,206	126.7%	126.7%		920,047	1,027,418	111.7%
2030	389,569	774,152	774,152				1,123,718	145.2%	145.2%		864,902	1,106,240	127.9%
2031	364,090	723,520	723,520				1,199,021	165.7%	165.7%		808,335	1,179,870	146.0%
2032	338,302	672,273	672,273				1,264,739	188.1%	188.1%		751,080	1,244,025	165.6%
2033	312,461	620,923	620,923				1,318,981	212.4%	212.4%		693,710	1,296,854	186.9%
2034	286,772	569,873	569,873				1,359,998	238.6%	238.6%		636,676	1,336,639	209.9%
2035	261,434	519,522	519,522				1,387,691	267.1%	267.1%		580,423	1,363,304	234.9%
2036	236,621	470,214	470,214				1,398,756	297.5%	297.5%		525,334	1,373,623	261.5%
2037	212,524	422,328	422,328				1,388,334	328.7%	328.7%		471,835	1,362,863	288.8%
2038	189,357	376,291	376,291				1,359,208	361.2%	361.2%		420,401	1,333,760	317.3%
2039	167,292	332,443	332,443				1,314,324	395.4%	395.4%		371,414	1,289,222	347.1%
2040	146,499	291,123	291,123				1,254,931	431.1%	431.1%		325,250	1,230,505	378.3%
2041	127,143	252,658	252,658				1,181,236	467.5%	467.5%		282,276	1,157,832	410.2%
2042	109,329	217,258	217,258				1,093,627	503.4%	503.4%		242,726	1,071,602	441.5%
2043	93,119	185,046	185,046				999,022	539.9%	539.9%		206,738	978,580	473.3%
2044	78,551	156,096	156,096				901,843	577.8%	577.8%		174,394	883,108	506.4%
2045	65,611	130,382	130,382				806,288	618.4%	618.4%		145,666	789,284	541.8%
2046	54,272	107,850	107,850				713,387	661.5%	661.5%		120,492	698,121	579.4%
2047	44,474	88,378	88,378				623,785	705.8%	705.8%		98,738	610,248	618.0%
2048	36,104	71,745	71,745				540,830	753.8%	753.8%		80,155	528,932	659.9%
2049	29,041	57,711	57,711				465,764	807.1%	807.1%		64,476	455,386	706.3%
2050	23,159	46,021	46,021				400,273	869.8%	869.8%		51,416	391,237	760.9%
2051	18,323	36,411	36,411				342,171	939.8%	939.8%		40,679	334,349	821.9%
2052	14,400	28,615	28,615				289,450	1011.5%	1011.5%		31,970	282,761	884.5%
2053	11,248	22,352	22,352				244,309	1093.0%	1093.0%		24,972	238,604	955.5%
2054	8,739	17,366	17,366				205,408	1182.8%	1182.8%		19,402	200,564	1033.7%
2055	6,757	13,428	13,428				171,858	1279.9%	1279.9%		15,002	167,768	1118.3%
2056	5,204	10,341	10,341				141,950	1372.7%	1372.7%		11,554	138,543	1199.1%
2057	3,996	7,941	7,941				114,763	1445.1%	1445.1%		8,872	111,989	1262.3%
2058	3,058	6,077	6,077				91,798	1510.6%	1510.6%		6,789	89,565	1319.2%
2059	2,331	4,632	4,632				72,551	1566.3%	1566.3%		5,175	70,775	1367.6%
2060	1,771	3,519	3,519				56,321	1600.3%	1600.3%		3,932	54,933	1397.1%
2061	1,344	2,671	2,671				43,112	1614.2%	1614.2%		2,984	42,043	1409.0%
2062	1,020	2,028	2,028				32,550	1605.4%	1605.4%		2,265	31,739	1401.1%
2063	776	1,542	1,542				24,327	1577.9%	1577.9%		1,722	23,717	1376.9%
2064	592	1,176	1,176				18,006	1531.1%	1531.1%		1,314	17,552	1335.9%
2065	454	903	903				13,193	1461.4%	1461.4%		1,009	12,858	1274.9%
2066	352	700	700				9,620	1375.1%	1375.1%		782	9,375	1199.5%
2067	276	549	549				7,040	1283.5%	1283.5%		613	6,860	1119.4%
2068	218	434	434				5,220	1203.0%	1203.0%		485	5,086	1049.1%
2069	174	345	345				3,942	1142.3%	1142.3%		386	3,840	996.1%
2070	138	275	275				3,013	1094.8%	1094.8%		307	2,935	954.6%
2071	111	220	220				2,331	1060.7%	1060.7%		245	2,270	924.8%
2072	88	176	176				1,827	1040.7%	1040.7%		196	1,780	907.3%
2073	70	139	139				1,447	1040.9%	1040.9%		155	1,409	907.4%
2074	55	108	108				1,154	1064.6%	1064.6%		121	1,124	928.0%
2075	42	83	83				896	1081.6%	1081.6%		93	873	942.8%
2076	31	62	62				669	1074.4%	1074.4%		70	652	936.5%
2077	23	46	46				496	1085.0%	1085.0%		51	483	945.8%
2078	17	33	33				362	1102.1%	1102.1%		37	352	960.7%
Without Interest													
Past	10,784,209	9,760,947	10,784,209	928,921	720,287	43,150	1,692,358	15.7%	15.7%		10,784,209	1,692,358	15.7%
Future		8,909,125	17,589,588				30,976,177		176.1%		19,388,531	30,430,152	156.9%
Lifetime		18,670,073	28,373,797				32,668,535		115.1%		30,172,740	32,122,509	106.5%
With 4% Interest													
Past	13,713,255	12,616,421	13,713,255	1,193,265	743,862	44,385	1,981,513	14.4%	14.4%		13,713,255	1,981,513	14.4%
Future		6,298,393	12,403,516				16,660,245		134.3%		13,605,388	16,387,015	120.4%
Lifetime		18,914,814	26,116,771				18,641,758		71.4%		27,318,643	18,368,527	67.2%

Exhibit 4b
Continental General Insurance Company
Pennsylvania Experience
Premium Paying Policies Only
Policy Forms: 4LTCIP0001

Calendar Year	Without Proposed Rate Increase										With Proposed 15% Rate Increase		
	Premium			By Incurral Year				Incurred Loss Ratio			Premium	Incurred	Incld LR
	Actual	Original Rtlvl	State Rtlvl	Pd Clms	Clm Res	IBNR	Inc Clms	Actual	State Rtlvl		State Rtlvl	Claims	State Rtlvl
2006	0	0	0	0	0	0	0	0.0%	0.0%		0	0	0.0%
2007	209,721	209,721	209,721	0	0	0	0	0.0%	0.0%		209,721	0	0.0%
2008	585,548	585,548	585,548	0	0	0	0	0.0%	0.0%		585,548	0	0.0%
2009	728,495	728,495	728,495	149,154	0	0	149,154	20.5%	20.5%		728,495	149,154	20.5%
2010	768,225	768,225	768,225	0	0	0	0	0.0%	0.0%		768,225	0	0.0%
2011	753,293	753,293	753,293	349,302	0	0	349,302	46.4%	46.4%		753,293	349,302	46.4%
2012	736,756	736,756	736,756	0	0	0	0	0.0%	0.0%		736,756	0	0.0%
2013	717,948	717,948	717,948	0	0	0	0	0.0%	0.0%		717,948	0	0.0%
2014	696,009	696,009	696,009	133,590	0	0	133,590	19.2%	19.2%		696,009	133,590	19.2%
2015	736,745	676,082	736,745	38,759	0	0	38,759	5.3%	5.3%		736,745	38,759	5.3%
2016	776,850	654,431	776,850	27,522	0	0	27,522	3.5%	3.5%		776,850	27,522	3.5%
2017	866,612	650,008	866,612	99,585	70,996	1,844	172,425	19.9%	19.9%		866,612	172,425	19.9%
2018	871,439	604,174	871,439	126,561	197,976	11,506	336,043	38.6%	38.6%		871,439	336,043	38.6%
2019	722,703	446,523	722,703	0	440,295	28,470	468,765	64.9%	64.9%		722,703	468,765	64.9%
Jan-Sept													
Oct-Dec													
2019	151,809		245,704				78,809		32.1%		245,704	78,809	32.1%
2020	598,775		1,131,230				359,859		31.8%		1,131,230	359,859	31.8%
2021	584,902		1,162,317				416,985		35.9%		1,200,989	415,467	34.6%
2022	565,497		1,123,756				477,557		42.5%		1,251,483	471,488	37.7%
2023	539,279		1,071,654				543,547		50.7%		1,197,279	536,267	44.8%
2024	521,730		1,036,782				613,605		59.2%		1,158,318	605,191	52.2%
2025	503,047		999,655				688,450		68.9%		1,116,839	678,767	60.8%
2026	482,827		959,473				766,534		79.9%		1,071,947	755,468	70.5%
2027	461,191		916,479				846,803		92.4%		1,023,914	834,243	81.5%
2028	438,331		871,051				928,537		106.6%		973,160	914,396	94.0%
2029	414,408		823,511				1,009,626		122.6%		920,047	993,838	108.0%
2030	389,569		774,152				1,089,172		140.7%		864,902	1,071,694	123.9%
2031	364,090		723,520				1,164,232		160.9%		808,335	1,145,081	141.7%
2032	338,302		672,723				1,230,427		183.0%		751,080	1,209,713	161.1%
2033	312,461		620,923				1,285,636		207.1%		693,710	1,263,508	182.1%
2034	286,772		569,873				1,328,265		233.1%		636,676	1,304,907	205.0%
2035	261,434		519,522				1,357,980		261.4%		580,423	1,333,592	229.8%
2036	236,621		470,214				1,371,583		291.7%		525,334	1,346,450	256.3%
2037	212,524		422,328				1,364,211		323.0%		471,835	1,338,741	283.7%
2038	189,357		376,291				1,338,073		355.6%		420,401	1,312,624	312.2%
2039	167,292		332,443				1,296,050		389.9%		371,414	1,270,948	342.2%
2040	146,499		291,123				1,239,299		425.7%		325,250	1,214,873	373.5%
2041	127,143		252,658				1,167,979		462.3%		282,276	1,144,575	405.5%
2042	109,329		217,258				1,082,449		498.2%		242,726	1,060,424	436.9%
2043	93,119		185,046				989,570		534.8%		206,738	969,128	468.8%
2044	78,551		156,096				893,795		572.6%		174,394	875,060	501.8%
2045	65,611		130,382				799,316		613.1%		145,666	782,312	537.1%
2046	54,272		107,850				707,314		655.8%		120,492	692,047	574.3%
2047	44,474		88,378				618,419		699.7%		98,738	604,882	612.6%
2048	36,104		71,745				536,035		747.1%		80,155	524,136	653.9%
2049	29,041		57,711				461,402		799.5%		64,476	451,024	699.5%
2050	23,159		46,021				396,258		861.0%		51,416	387,222	753.1%
2051	18,323		36,411				338,568		929.9%		40,679	330,747	813.1%
2052	14,400		28,615				286,223		1000.2%		31,970	279,534	874.4%
2053	11,248		22,352				241,445		1080.2%		24,972	235,740	944.0%
2054	8,739		17,366				202,877		1168.2%		19,402	198,033	1020.7%
2055	6,757		13,428				169,651		1263.4%		15,002	165,562	1103.6%
2056	5,204		10,341				140,157		1355.3%		11,554	136,750	1183.6%
2057	3,996		7,941				113,335		1427.2%		8,872	110,561	1246.2%
2058	3,058		6,077				90,678		1492.2%		6,789	88,445	1302.7%
2059	2,331		4,632				71,696		1547.8%		5,175	69,920	1351.1%
2060	1,771		3,519				55,680		1582.1%		3,932	54,293	1380.8%
2061	1,344		2,671				42,644		1596.7%		2,984	41,575	1393.4%
2062	1,020		2,028				32,216		1588.9%		2,265	31,405	1386.4%
2063	776		1,542				24,094		1562.7%		1,722	23,484	1363.4%
2064	592		1,176				17,846		1517.5%		1,314	17,392	1323.7%
2065	454		903				13,084		1449.4%		1,009	12,750	1264.2%
2066	352		700				9,549		1364.9%		782	9,304	1190.4%
2067	276		549				6,994		1275.0%		613	6,813	1111.8%
2068	218		434				5,189		1196.0%		485	5,055	1042.8%
2069	174		345				3,922		1136.6%		386	3,821	990.9%
2070	138		275				3,000		1090.1%		307	2,922	950.4%
2071	111		220				2,322		1056.9%		245	2,262	921.4%
2072	88		176				1,822		1037.6%		196	1,774	904.5%
2073	70		139				1,444		1038.4%		155	1,406	905.1%
2074	55		108				1,152		1062.5%		121	1,122	926.1%
2075	42		83				895		1079.8%		93	872	941.2%
2076	31		62				668		1072.9%		70	651	935.2%
2077	23		46				495		1083.7%		51	482	944.5%
2078	17		33				361		1100.9%		37	352	959.6%
Without Interest													
Past	9,170,342	8,227,211	9,170,342	924,471	709,267	41,820	1,675,558	18.3%	18.3%		9,170,342	1,675,558	18.3%
Future		8,909,125	17,589,588				30,325,786		172.4%		19,388,531	29,779,761	153.6%
Lifetime		17,136,336	26,759,930				32,001,344		119.6%		28,558,873	31,455,319	110.1%
With 4% Interest													
Past	11,583,293	10,575,011	11,583,293	1,188,592	732,288	42,990	1,963,870	17.0%	17.0%		11,583,293	1,963,870	17.0%
Future		6,298,393	12,403,516				16,257,080		131.1%		13,605,388	15,983,849	117.5%
Lifetime		16,873,405	23,986,809				18,220,950		76.0%		25,188,682	17,947,719	71.3%

Exhibit 5
Continental General Insurance Company
Nationwide Experience (Excluding Florida)
Premium Paying Policies Only
Projection on Original Rate Level
Policy Forms: 4LTCIP0001, 4LTCIP0002

Calendar Year	Original Assumptions				Current Assumptions			
	Earned Premium	Incurred Claims	Loss Ratio		Earned Premium*	Incurred Claims**	Loss Ratio	
Oct - Dec 2019	1,792,337	855,300	47.7%		2,702,205	1,386,832	51.3%	
2020	10,471,901	5,431,177	51.9%		10,654,169	6,120,416	57.4%	
2021	9,986,750	5,959,343	59.7%		10,315,200	7,107,549	68.9%	
2022	9,497,394	6,507,078	68.5%		9,853,848	8,297,090	84.2%	
2023	9,006,074	7,069,139	78.5%		9,550,282	9,376,597	98.2%	
2024	8,514,873	7,643,324	89.8%		9,239,964	10,495,029	113.6%	
2025	8,025,673	8,228,102	102.5%		8,921,721	11,652,675	130.6%	
2026	7,540,206	8,817,050	116.9%		8,578,269	12,833,443	149.6%	
2027	7,060,132	9,398,373	133.1%		8,191,059	14,021,718	171.2%	
2028	6,587,092	9,960,326	151.2%		7,794,964	15,210,687	195.1%	
2029	6,122,763	10,493,478	171.4%		7,390,321	16,384,145	221.7%	
2030	5,668,885	10,988,060	193.8%		6,975,246	17,509,599	251.0%	
2031	5,227,177	11,431,144	218.7%		6,550,152	18,547,364	283.2%	
2032	4,799,333	11,808,750	246.0%		6,121,524	19,468,303	318.0%	
2033	4,387,022	12,109,744	276.0%		5,693,507	20,259,779	355.8%	
2034	3,991,781	12,325,968	308.8%		5,269,200	20,908,265	396.8%	
2035	3,614,972	12,449,689	344.4%		4,851,527	21,382,549	440.7%	
2036	3,257,850	12,474,257	382.9%		4,443,421	21,651,546	487.3%	
2037	2,921,565	12,397,027	424.3%		4,047,756	21,706,605	536.3%	
2038	2,607,037	12,219,281	468.7%		3,667,210	21,564,923	588.0%	
2039	2,314,911	11,944,345	516.0%		3,304,061	21,244,602	643.0%	
2040	2,045,551	11,577,195	566.0%		2,960,359	20,750,739	701.0%	
2041	1,799,046	11,128,300	618.6%		2,637,854	20,080,198	761.2%	
2042	1,575,214	10,614,119	673.8%		2,337,870	19,245,140	823.2%	
2043	1,373,606	10,050,898	731.7%		2,061,132	18,280,214	886.9%	
2044	1,193,467	9,451,025	791.9%		1,807,925	17,224,808	952.7%	
2045	1,033,728	8,830,151	854.2%		1,577,867	16,126,077	1022.0%	
2046	893,161	8,255,803	924.3%		1,370,639	15,003,681	1094.6%	
2047	770,577	7,877,314	1022.3%		1,185,659	13,863,609	1169.3%	
2048	664,569	7,580,765	1140.7%		1,021,586	12,726,912	1245.8%	
2049	573,242	7,046,910	1229.3%		877,054	11,618,207	1324.7%	
2050	494,544	6,257,169	1265.2%		750,518	10,575,014	1409.0%	
2051	426,664	5,422,394	1270.9%		640,366	9,594,228	1498.2%	
2052	368,100	4,678,124	1270.9%		545,051	8,666,131	1590.0%	
2053	317,576	4,036,012	1270.9%		463,059	7,806,899	1685.9%	
2054	273,986	3,482,035	1270.9%		392,840	7,022,777	1787.7%	
2055	236,389	3,011,078	1273.8%		332,898	6,313,002	1896.4%	
2056	204,089	2,686,270	1316.2%		281,850	5,662,177	2008.9%	
2057	176,786	2,708,669	1532.2%		238,463	5,051,710	2118.4%	
2058	154,071	2,984,771	1937.3%		201,671	4,485,968	2224.4%	
2059	134,987	3,091,616	2290.3%		170,496	3,973,247	2330.4%	
2060	118,538	2,894,760	2442.1%		144,057	3,515,081	2440.1%	
2061	104,131	2,568,177	2466.3%		121,599	3,101,221	2550.4%	
2062	91,476	2,256,057	2466.3%		102,496	2,720,022	2653.8%	
2063	80,359	1,981,871	2466.3%		86,240	2,370,212	2748.4%	
2064	70,592	1,741,007	2466.3%		72,403	2,056,440	2840.3%	
2065	61,996	1,533,557	2473.6%		60,607	1,777,393	2932.7%	
2066	54,223	1,399,018	2580.1%		50,539	1,526,246	3019.9%	
2067	46,492	1,453,037	3125.4%		41,958	1,300,127	3098.7%	
2068	38,427	1,608,350	4185.5%		34,665	1,098,226	3168.2%	
2069	30,720	1,594,826	5191.5%		28,489	921,482	3234.5%	
2070	24,174	1,372,851	5678.9%		23,274	768,654	3302.7%	
2071	18,969	1,093,980	5767.1%		18,883	635,837	3367.3%	
2072	14,885	858,428	5767.1%		15,208	519,847	3418.3%	
2073	11,680	673,594	5767.1%		12,154	419,358	3450.5%	
2074	9,165	528,558	5767.1%		9,634	335,002	3477.2%	
2075	7,189	415,156	5774.5%		7,567	265,175	3504.1%	
2076	5,611	330,710	5893.9%		5,884	207,316	3523.4%	
2077	4,265	278,700	6534.0%		4,527	160,080	3535.8%	
2078	3,073	243,056	7909.5%		3,449	122,759	3558.8%	
2079	2,095	197,240	9415.3%		-	-	0.0%	
2080	1,385	142,447	10283.3%		-	-	0.0%	
2081	910	95,293	10471.8%		-	-	0.0%	
2082	598	62,601	10471.8%		-	-	0.0%	
2083	393	41,125	10471.8%		-	-	0.0%	
2084	258	27,016	10471.8%		-	-	0.0%	
2085	169	17,727	10471.8%		-	-	0.0%	
2086	109	11,375	10471.8%		-	-	0.0%	
2087	61	6,439	10471.8%		-	-	0.0%	
2088	25	2,669	10471.8%		-	-	0.0%	
2089	6	589	10471.8%		-	-	0.0%	

Loss Ratio Summaries as of 09/30/2019 (Discounted at 4%)						
Projected	98,557,984	180,010,224	182.6%	114,818,867	286,934,168	249.9%
Prospective PV Rate Increase Calculation						
1. Δ PV(Future Incurred Claims)***						135,617,361
2. Δ PV(Future Earned Premium)						16,260,883
3. PV _{Current} (Future Earned Premium)						114,818,867
4. Rate Increase %		<div>Δ PV(Future Incurred Claims) - 58% * Δ PV(Future Earned Premium)</div> <div>85% * PV_{Current}(Future Earned Premium)</div>				129%
5. State- Specific cumulative percent rate increase to date						99%
6. State- Specific Adjusted Rate Increase						15%

*Includes Shock Lapse

**Includes Shock Lapse and Proposed RINC for Survivorship and WOP

***Current Assumptions Experience Contains MAE and Includes Shock Lapse and Proposed RINC for Survivorship and WOP

Exhibit 6
Continental General Insurance Company
Policy Form: 4LTCIP0001
Eligibility for Contingent Benefit Upon Lapse (CBUL)

PA State Specific

Lives Inforce	Issue Age								Total
	< 50	50 - 54	55 - 59	60 - 64	65 - 69	70 - 74	75 - 79	80 +	
Total Premium Paying	20	31	106	126	47	25	9	0	364
Rate-Stability	20	31	106	126	47	25	9	0	364
Eligible for CBUL	6	31	106	126	47	25	9	0	350

Exhibit 7
Continental General Insurance Company
Nationwide Experience (Excluding Florida)
Rate Increase History as of Filing Date
Policy Forms: 4LTCIP0001, 4LTCIP0002

States	1st Increase				2nd Increase				3rd Increase				4th Increase				Cumulative %
	Date	Percent	Date	Percent	Date	Percent	Date	Percent	Date	Percent	Date	Percent	Date	Percent	Date	Percent	
	Requested	Requested	Approved	Approved	Requested	Requested	Approved	Approved	Requested	Requested	Approved	Approved	Requested	Requested	Approved	Approved	
AK	10/3/2013	20.0%	10/30/2013	20.0%	2/17/2016	30.0%	6/30/2016	30.0%	7/2/2020	42.4%	PENDING						56.0%
AL	9/5/2013	20.0%	12/23/2013	20.0%	2/10/2016	30.0%	12/5/2016	30.0%	11/20/2017	17.6%	PENDING	0.0%					56.0%
AR	11/14/2013	20.0%	1/22/2014	0.0%	2/10/2016	30.0%	8/8/2016	10.0%	12/10/2017	76.5%	1/18/2018	25.0%	5/15/2020	57.0%	PENDING		37.5%
AZ	12/9/2013	20.0%	1/7/2014	0.0%	9/26/2018	98.7%	7/9/2019	45.5%									45.5%
CO	4/30/2019	97.0%	PENDING														0.0%
DE	10/23/2013	20.0%	1/17/2014	20.0%	2/18/2016	30.0%	4/27/2016	25.0%	2/2/2018	22.1%	4/19/2018	22.1%					83.2%
GA	9/25/2013	20.0%	3/4/2014	12.0%	2/12/2016	30.0%	5/11/2016	12.0%	11/29/2017	49.2%	3/6/2018	16.0%	6/14/2019	43.0%	8/26/2019	12.0%	63.0%
IA	11/21/2013	20.0%	5/13/2014	17.0%	6/27/2016	30.0%	10/11/2016	15.0%	1/30/2018	38.8%	5/8/2018	30.0%	4/8/2020	28.0%	PENDING		74.9%
ID	9/24/2013	20.0%	2/10/2014	20.0%	2/16/2016	30.0%	9/16/2016	30.0%	10/31/2019	33.0%	PENDING						56.0%
IL	9/24/2013	20.0%	5/7/2018	99.8%													99.8%
IN	7/2/2019	93.0%	8/21/2019	0.0%	1/31/2020	88.0%	2/28/2020	0.0%									0.0%
KS	10/22/2013	20.0%	11/26/2014	0.0%	5/27/2016	30.0%	9/16/2016	30.0%	11/27/2017	48.2%	7/19/2019	32.7%					72.5%
KY	3/3/2014	20.0%	5/29/2014	9.8%	7/12/2016	30.0%	10/10/2016	20.0%									31.8%
LA	9/16/2013	20.0%	10/8/2013	0.0%	2/12/2016	30.0%	11/2/2016	15.0%	11/20/2017	68.9%	3/7/2019	10.0%					26.5%
MA																	0.0%
MD	9/16/2013	20.0%	2/25/2014	15.0%	2/10/2016	15.0%	6/10/2016	15.0%									32.3%
ME	4/22/2013	20.0%	10/28/2014	20.0%													20.0%
MI	9/11/2013	20.0%	11/22/2013	20.0%	2/10/2016	30.0%	2/19/2016	30.0%	11/20/2017	15.6%	1/11/2018	15.6%					80.3%
MN	10/23/2013	20.0%	2/20/2014	20.0%	2/23/2016	30.0%	9/15/2016	7.1%	5/6/2019	43.0%	2/13/2020	26.5%					62.6%
MO	9/17/2013	20.0%	2/3/2014	20.0%	2/1/2018	55.5%	5/6/2020	59.6%									91.5%
MS	11/15/2013	20.0%	2/7/2014	20.0%	4/19/2016	25.0%	10/11/2016	25.0%	11/20/2017	22.1%	7/9/2019	5.7%					58.6%
MT	9/23/2013	20.0%	11/22/2013	20.0%	2/19/2016	30.0%	7/19/2016	30.0%									56.0%
NC	2/6/2014	20.0%	6/2/2014	20.0%	5/3/2016	30.0%	1/31/2017	20.0%	11/27/2017	29.8%	6/21/2018	19.0%	4/2/2020	31.5%	PENDING		71.4%
ND	9/16/2013	20.0%	10/21/2013	15.0%	2/12/2016	30.0%	3/14/2016	15.0%	11/20/2017	40.6%	1/19/2018	44.0%					90.4%
NE	11/5/2013	20.0%	2/24/2014	20.0%	2/12/2016	30.0%	5/16/2016	30.0%	11/30/2017	17.6%	9/17/2018	17.6%					83.4%
NH	11/14/2013	20.0%	3/17/2015	0.0%													0.0%
NM	2/10/2014	20.0%	4/24/2014	0.0%	5/27/2016	30.0%	8/4/2016	6.0%	4/30/2019	85.0%	6/28/2019	15.0%					21.9%
NV	11/5/2013	20.0%	11/14/2014	20.0%	2/23/2016	30.0%	2/2/2017	30.0%	11/30/2017	19.4%	7/13/2018	19.4%					86.3%
OH	8/30/2013	20.0%	10/23/2013	20.0%	5/27/2016	30.0%	6/29/2016	15.0%	12/20/2017	15.0%	1/11/2018	15.0%	7/2/2019	15.0%	11/6/2019	15.0%	82.5%
OK	11/6/2013	20.0%	3/5/2014	20.0%	2/25/2016	30.0%	4/14/2016	10.0%	11/27/2017	40.6%	5/16/2018	10.0%	7/30/2019	43.0%	8/20/2019	32.3%	92.0%
OR	3/4/2014	20.0%	4/9/2015	20.0%	9/28/2018	61.6%	PENDING	0.0%									20.0%
PA	5/22/2014	20.0%	9/11/2014	15.0%	3/8/2016	30.0%	6/20/2016	20.0%	11/27/2017	35.6%	5/24/2018	20.0%	6/14/2019	25.0%	9/3/2019	20.0%	98.7%
RI	10/3/2013	20.0%	5/10/2019	0.0%													0.0%
SC	10/23/2013	20.0%	2/25/2014	20.0%	2/17/2016	30.0%	5/19/2016	20.0%	11/27/2017	26.6%	1/18/2018	20.0%	9/27/2019	20.0%	PENDING		72.8%
SD	11/21/2013	20.0%	11/25/2013	20.0%	4/19/2016	30.0%	5/31/2016	30.0%	12/8/2017	17.3%	12/15/2017	17.3%					83.0%
TN	10/3/2013	20.0%	2/4/2014	20.0%	4/19/2016	30.0%	11/7/2016	30.0%	4/30/2019	26.0%	7/1/2019	16.0%					80.9%
TX	4/24/2014	20.0%	4/25/2014	0.0%	12/22/2016	30.0%	4/3/2017	45.0%									45.0%
UT	11/27/2013	20.0%	1/20/2014	20.0%	10/3/2016	30.0%	2/9/2017	30.0%	9/24/2018	19.1%	2/26/2019	12.0%					74.7%
VA	6/2/2016	30.0%	6/29/2017	0.0%	2/28/2018	95.8%	1/8/2019	0.0%	5/16/2019	96.0%	PENDING						0.0%
VT	11/6/2013	20.0%	8/27/2014	0.0%													0.0%
WA	10/3/2013	20.0%	11/22/2013	20.0%	2/12/2016	30.0%	8/10/2016	30.0%	6/4/2020	41.0%	PENDING						56.0%
WI	11/19/2013	20.0%	12/11/2013	20.0%	2/25/2016	30.0%	4/4/2017	30.0%	5/15/2019	26.0%	7/31/2019	26.0%					96.6%
WV	11/6/2013	20.0%	1/6/2014	20.0%	2/24/2016	30.0%	5/27/2016	30.0%	8/1/2019	33.0%	5/8/2020	27.1%					98.3%
WY	11/27/2013	20.0%	12/26/2013	20.0%	3/9/2016	30.0%	4/27/2016	30.0%	11/20/2017	16.2%	12/21/2017	16.2%					81.3%

Exhibit 8
Nationwide Experience (excluding FL)
If-Knew at PA Requested Rate Levels
Premium Paying Policies Only
Policy Forms: 4LTCIP0001, 4LTCIP0002

Calendar Year	Original Premium	Earned Premium	Incurred Claims*	Incurred Loss Ratio
2006	361,165	717,708	-	0.0%
2007	4,526,105	8,994,275	462,592	5.1%
2008	10,631,659	21,127,233	504,759	2.4%
2009	14,150,569	28,120,010	880,102	3.1%
2010	14,954,759	29,718,097	1,426,145	4.8%
2011	13,535,052	26,896,856	1,638,101	6.1%
2012	13,010,175	25,853,819	950,385	3.7%
2013	12,616,176	25,070,864	2,078,797	8.3%
2014	12,240,841	24,324,999	2,005,160	8.2%
2015	11,758,417	23,366,326	3,594,834	15.4%
2016	11,560,240	22,972,508	3,419,454	14.9%
2017	11,135,411	22,128,289	4,671,362	21.1%
2018	10,703,373	21,269,744	4,996,417	23.5%
2019	7,763,826	15,428,275	4,958,147	32.1%
2019	2,702,205	5,369,821	1,586,589	29.5%
2020	10,654,169	21,171,965	7,087,068	33.5%
2021	10,399,320	20,665,528	8,131,840	39.3%
2022	10,133,884	20,138,053	9,258,254	46.0%
2023	9,830,450	19,535,070	10,455,816	53.5%
2024	9,511,028	18,900,316	11,707,752	61.9%
2025	9,183,449	18,249,350	13,004,780	71.3%
2026	8,829,922	17,546,821	14,329,040	81.7%
2027	8,431,353	16,754,784	15,663,130	93.5%
2028	8,023,638	15,944,573	16,999,321	106.6%
2029	7,607,124	15,116,877	18,319,506	121.2%
2030	7,179,872	14,267,842	19,587,121	137.3%
2031	6,742,308	13,398,313	20,757,608	154.9%
2032	6,301,105	12,521,556	21,798,111	174.1%
2033	5,860,532	11,646,049	22,694,234	194.9%
2034	5,423,778	10,778,132	23,430,630	217.4%
2035	4,993,851	9,923,781	23,971,914	241.6%
2036	4,573,774	9,089,003	24,283,064	267.2%
2037	4,166,501	8,279,671	24,354,106	294.1%
2038	3,774,791	7,501,265	24,204,113	322.7%
2039	3,400,989	6,758,445	23,853,166	352.9%
2040	3,047,205	6,055,405	23,306,692	384.9%
2041	2,715,239	5,395,722	22,561,023	418.1%
2042	2,406,454	4,782,104	21,629,659	452.3%
2043	2,121,598	4,216,039	20,551,458	487.5%
2044	1,860,962	3,698,105	19,370,646	523.8%
2045	1,624,155	3,227,521	18,140,288	562.1%
2046	1,410,848	2,803,637	16,882,485	602.2%
2047	1,220,442	2,425,262	15,603,949	643.4%
2048	1,051,555	2,089,651	14,328,394	685.7%
2049	902,783	1,794,011	13,083,576	729.3%
2050	772,535	1,535,182	11,911,850	775.9%
2051	659,152	1,309,866	10,809,741	825.3%
2052	561,040	1,114,899	9,766,353	876.0%
2053	476,643	947,185	8,800,022	929.1%
2054	404,365	803,554	7,917,859	985.4%
2055	342,664	680,942	7,119,076	1045.5%
2056	290,118	576,522	6,386,356	1107.7%
2057	245,459	487,776	5,698,783	1168.3%
2058	207,587	412,517	5,061,362	1226.9%
2059	175,498	348,750	4,483,517	1285.6%
2060	148,283	294,668	3,967,032	1346.3%
2061	125,166	248,729	3,500,374	1407.3%
2062	105,503	209,656	3,070,435	1464.5%
2063	88,770	176,404	2,675,810	1516.9%
2064	74,527	148,100	2,321,779	1567.7%
2065	62,385	123,971	2,006,882	1618.8%
2066	52,022	103,377	1,723,427	1667.1%
2067	43,189	85,824	1,468,185	1710.7%
2068	35,681	70,906	1,240,254	1749.1%
2069	29,325	58,274	1,040,704	1785.9%
2070	23,956	47,606	868,143	1823.6%
2071	19,437	38,624	718,163	1859.4%
2072	15,654	31,107	587,175	1887.6%
2073	12,510	24,860	473,685	1905.4%
2074	9,917	19,707	378,411	1920.2%
2075	7,789	15,479	299,543	1935.1%
2076	6,057	12,036	234,190	1945.8%
2077	4,660	9,261	180,833	1952.7%
2078	3,551	7,056	138,674	1965.4%

Discounted at 4%

Past	192,562,657	382,660,511	37,057,497	9.7%
Future	117,592,719	233,680,251	322,056,942	137.8%
Lifetime	310,155,375	616,340,762	359,114,440	58.3%

*Projected incurred claims include a 10% load for MAE